US ERA ARCHIVE DOCUMENT



STATE OF TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Air Pollution Control Division 9th Floor, L & C Annex, 401 Church Street, Nashville, TN 37243

June 12, 2003

Kay T. Prince, Chief of Air Planning Branch US EPA, Region IV Atlanta Federal Center, 12th Floor 61 Forsyth Street, SW Atlanta, GA 30303

RE: Submittal of "Likely" Control Measures for Early Action Compact Areas

Dear Ms. Prince:

In accordance with the Early Action Compact (EAC) agreement, you will find enclosed the "likely" list of control measures for each of the EAC areas in Tennessee. This is being submitted on behalf of each EAC area to comply with the June 16, 2003 milestone. Each compact area has selected control measures for their county, which are being considered as a means to achieve the 8-hour ozone standard by 2007.

The following information is enclosed:

- Executive Summary
- EPA Checklist of June 16, 2003, Control Measures List
- Table 1 Summary of likely EAC Control Measures by county with chosen control measures
- Table 2 List of Control Measures with ID assigned to interpret Table 1
- Table 3 List of likely Statewide Control Measures being considered
- Tennessee Map Showing 8 hour ozone design values by MSA for 2000-2002
- Copy of the April 14, 2003, Memorandum from Lydia N. Wegman
- Likely Control Measures List and the signatory pages for the Chattanooga area, Haywood County, Knoxville area, Memphis area, Nashville area, Putnam County and the Tri-Cities area. Lawrence County submitted a request to opt out of the EAC.

Kay T. Prince, EPA, Region IV June 12, 2003 Page 2

I believe this submittal satisfies all requirements of the June 16th EAC milestone, but if more information is needed do not hesitate to contact me.

Sincerely,

Barry K. Stephens, F.E.

Director

Division of Air Pollution Control

cc: Karen Borel & Dick Schutt, EPA, Region IV

Local Air Programs

Tennessee Air Pollution Control Board

EAC Signatories

EXECUTIVE SUMMARY

Enclosed please find the necessary documentation to the meet the Ozone Early Action Compact (EAC) deadline for submittal of Likely Control Measures for Tennessee due June 16, 2003. This documentation meets the guidance provided in the letter signed by Lydia N. Wegman sent to appropriate Regional Administrators and Air Directors dated April 4, 2003 (enclosed for reference). The following describes the remaining contents of this submittal.

- 1. First find the June 16, 2003, EPA Control Measures Checklist.
- 2. Table 1 is a summary of the Likely Control Measures (LCM) chosen from a prepared list and submitted by each EAC. The table is arranged first by EAC, then by county within each EAC. The fourth column lists the chosen control measures for each county by a numeric ID. This ID identifies each of the control measures listed in Table 2 described next.
- 3. Table 2 is a slight modification of a list of LCM originally prepared by Dr. Wayne Davis, University of Tennessee, Knoxville, and the Nashville / Davidson County Air Program. This list was sent to all EACs to serve as a starting point for discussions and deliberations, and was specially targeted toward the rural counties. This table provides a brief description of each control measure along with other important information to assist the deliberative process. Each control measure is assigned a unique ID, and it is this ID that is listed in column four of Table 1. Please note that in some cases a reference is made in column four of Table 1 to an attachment. This was necessary when the submitting entity significantly modified or customized the original LCM list, or added additional control measures. Each EAC was encouraged to submit additional control measures tailored to their specific needs. The attached lists are found along with other documentation for each EAC in the tabbed sections of this binder described below.
- 4. Table 3 summarizes the Control Measures being considered for statewide implementation in Tennessee. Please note that regulatory development is currently underway.
- 5. Next comes a map of Tennessee detailing the 8-hour 2000-2002 ozone design values and Metropolitan Statistical Areas (MSA and CMSA). Also included is the Lydia Wegman letter dated April 4, 2003 referenced above.
- 6. Finally, find a tabbed section for each EAC. These sections contain transmittal letters, signature pages, and the LCM lists, some of which may be referenced in column four of Table 1 as discussed above.

Review Checklist for June 16, 2003, Control Measures List

- 1. Did the Early Action Compact area submit an identification and description of control measures being considered by the local area? YES
- 2. Was this list of controls submitted (postmarked or emailed) no later than June 16, 2003? YES
- 3. What date was the list of controls submitted? Submitted to EPA June 12, 2003
- 4. Who submitted the list of controls?

 Barry R. Stephens, P.E.

 Director, Division of Air Pollution Control
- 5. Does it appear that the control measures contained in the June 16 list of controls can be implemented in this specific EAC area? YES
- 6. Does it appear reasonable that the list of controls can be implemented within the time frame of the EAC, i.e., no later than 2005? YES

Table 1
Tennessee Likely EAC Control Measure Summary Table

	EAC	TN County	Chosen Control Measures By ID
1.	Chattanooga	Hamilton	3, 4, 5, 7, 8, 9, 10, 15, 16, 17, 21, 22, 23, & items 2, 3, 8 from custom list
2.		Marion	3, 4, 5, 7, 8, 9, 10, 15, 16, 17, 21, 22, 23, & items 2, 3, 8 from custom list
3.	-	Meigs	3, 4, 6, 8, 9, 10, 11, 14, 16, 18, 19, 20, 21, 22, 23
4.	Haywood	Haywood	3, 14, 15, 16, 20, 23, 25, 26, & item 9 in attached list
5.	Knoxville	Anderson	Control Measures 1-27
6.		Blount	Control Measures 1-27
7.		Jefferson	3, 7, 8, 12, 14, 15, 19, 22, 23, 25, 26
8.		Knox	Control Measures 1-27
9.		Loudon	Control Measures 1-27
10.		Sevier	Control Measures 1-27
11.	1	Union	Control Measures 1-27
12.	Lawrence	Lawrence	Opting out
13.	Memphis	Fayette	2, 4, 8, 9, 12, 15, 16, 17, 19, 21, 26, 27, & item 8 on attached list
14.		Shelby	See attached list of custom measures and descriptions for county
15.		Tipton	2, 4, 8, 9, 12, 15, 16, 17, 19, 21, 26, 27, & item 8 on attached list
16.	Nashville	Cheatham	12, 16, 19, 25
17.		Davidson	See attached list of custom measures and descriptions for county
18.	1	Dickson	Control Measures 1-27
19.	•	Robertson	5, 8, 10, 14, 16, 17, 19, 25. See also items 5, 6 on attached list.
20.		Rutherford	See attached list of custom measures and descriptions for county
21.		Sumner	1, 2, 4, 5, 6, 9, 11, 14, 15, 16, 17, 19, 20, 22, 23, & see items 15, 16, 20 from county custom list. See also custom lists for Hendersonville, Millersville, White House
22.	1	Williamson	Control Measures 1-27
23.	1	Wilson	1, 2, 3, 5, 6, 7, 12, 13, 15, 16, 18, 20, 22, 26, & item 15 from attached list
24.	Putnam	Putnam	1, 5, 6, 10, 12, 14, 15, 16, 17, 25, 26, 27, & item 2 on attached list
25.	Tri-Cities	Carter	
26.		Hawkins	
27.		Johnson	See attached custom list for entire EAC
28.	- 1	Sullivan	
29.		Unicoi	
30.		Washington	

TABLE 2 LIST OF LIKELY TENNESSEE EAC CONTROL MEASURES

ID	Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=State wide
1	Mobile LDGV, HDGV	Support evaluation of an IM program EAC-wide or Statewide	NOx,VOC,	M	R	L and/or S
2	Mobile LDV	Free gas cap replacement program (in conjunction with IM)	VOC	M	R	L and/or S
3	Mobile	Local governments investigate installation of fuel infrastructure and conversion of local government fleets to alternative fueled vehicles	NOx, VOC, CO	M	R, V	L
4	Gasoline refueling stations	Implement or expand Stage I and or Stage II in all MSA counties	voc	S	R	L and/or S
5	Stationary NOx sources	Support statewide NOx RACT Low NOx combustion controls	NOx	S	R	L and/or S
6	On-road HDDV and Buses	Encourage accelerated replacement with newer lower emitting vehicles	NOx, VOC,CO	М	V .	L and/or S
7	On and Off Road Diesel Vehicles	Retrofitting local government vehicles (diesel fleets including school buses)	NOx, VOC, CO	M	R, V	
8	On and Off Road Diesel Vehicles	Encourage accelerated replacement with newer lower emitting vehicles	NOx, VOC,CO	M	V	L and/or S
9	On and Off Road Diesel Vehicles	Encourage use of catalysts and low sulfur diesel	NOx	M	V	L and/or S

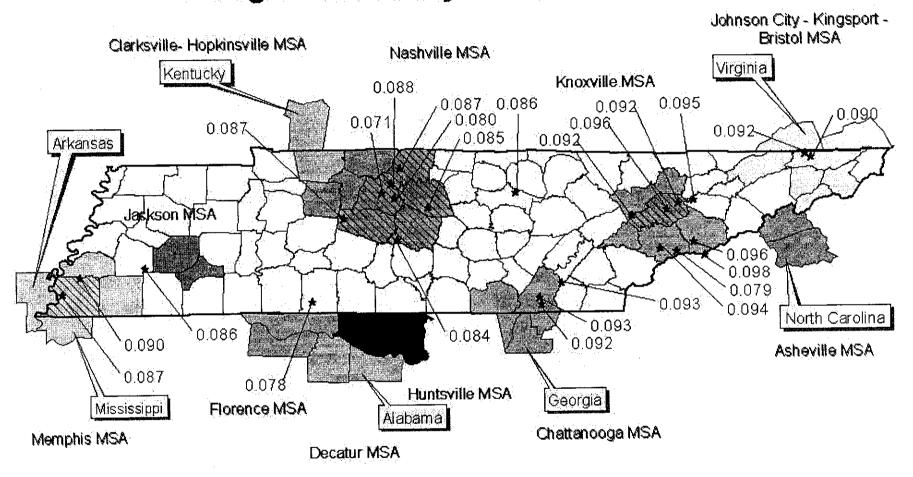
ID	Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=State wide
10	On and Off Road Diesel Vehicles	Support the use of Cetane diesel fuel additive	NOx	М	R	L and/or S
11	Fleet Vehicles	Propose accelerated replacement with newer lower emitting vehicles or with vehicles using cleaner fuels	NOx, VOC,CO	M	V	L and/or S
12	On-road vehicles	Traffic signalization/synchronization	NOx, VOC,CO	М	V	L
13	On-road vehicles	Roadside assistance/Incident management program	NOx, VOC,CO	М	V	L
14	HDDV and	Truck stop electrification/Anti-idling regulation	NOx, VOC,CO	M	V/R	L
15	All categories	Air Quality Action Day (AQAD)	NOx, VOC,CO	С	V	L and/or S
16	Open burning	Open burning banperhaps on ozone action days	NOx, VOC,CO	S	R	L
17	On-road HDDV trucks	Support reducing speed limit on ozone action days (or for the ozone season)	NÓx	M	V	L and/or S
18	On-road vehicles	Transportation management plan for large employers	NOx, VOC,CO	M	V	L
19	On-road vehicles	Area wide rideshare incentives	NOx, VOC,CO	M	V	L

-	ource ategory	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=State wide
On-ro 20 vehic		Support the enforcement of the smoking vehicle reg. similar to Davidson County to remove gross emitters from road	NOx, VOC,CO	M	R	L and/or S
All ga 21 engi	asoline nes	Support lower gasoline RVP	VOC	M	R	S
	liesel	Participate in a regional initiative to seek early introduction of ultra-low sulfur diesel fuel	NOX, VOC, CO	М	R, V	L or S
23 TDO	T	Support giving preference to bidders on state jobs with repowered, rebuilt or refueled diesel equipment	NOx, VOC,CO	М	R	S
Trip 24 Red	luctions	Employer-based trip reduction plans	NOx, VOC, CO	M	V	L and/or
All 25		Student outreach through education systems; educate future drivers on the impact of motor vehicles on the environment	NOx, VOC, CO	M	V	<u>L</u>
All 26		Public education at community events	NOx, VOC, CO	С	V	L
All 27		Air quality web page/public information	NOx, VOC, CO	С	V	L
	HERS					

TABLE 3 LIST OF LIKELY TENNESSEE EAC CONTROL MEASURES BEING CONSIDERED FOR STATEWIDE IMPLEMENTATION (REGULATORY DEVELOPMENT UNDERWAY)

ID	Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=State wide
1	Mobile	Expanding scope of IM program to include heavier weight vehicles (up to 10,000 GVWR) in Middle Tennessee only	NOx, VOC,	М	R	S and/or L
5	Stationary & Mobile NOx sources	Drafting statewide NOx RACT Rule -The rule is for NOx generating sources and facilities. The target is 50 TPY. It will require a RACT determination or verification of non- applicability.	NOx	S & M	R	S and/or L
10	On and Off Road Diesel Vehicles	Support the use of Cetane diesel fuel additive	NOx	М	R	S and/or L
14	HDDV and	Drafting statewide Anti-idling rule	NOx, VOC, CO	M	R	S and/or
20	On-road vehicles	Drafting smoking vehicle reg. similar to Davidson County to remove gross emitters from road	NOx, VOC, CO	M	R	S and/or L
	Other On-road vehicles	Drafting statewide vehicle Anti- tampering rule	NOx, VOC,	M	R	S and/or L

Tennessee 8 Hour Ozone Design Values By MSA 2000 - 2002



Notes:

Design values in parts per million.
Old 1-hr nonattainment areas in hatched areas.
A county with a design value greater than or equal to 0.085 ppm is violating the standard.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

RESEARCH TRIANGLE PARK, NC 27711

APR 0 4 2003

OFFICE OF AIR QUALITY PLANNING AND STANDARDS

MEMORANDUM

SUBJECT:

Early Action Compacts (EACs): The June 16, 2003 Submission and Other

Clarifications

FROM:

Lydia N. Wegman, Director

Air Quality Strategies and Standards Division

TO:

Air Directors, Regions III, IV, VI, and VIII

This memorandum responds to questions from States and local EAC areas about what needs to be included in the milestone submittals and semiannual reports due June and December 2003. As we have stated before, completion of each of the critical milestones and schedules as described in the "Protocol for Early Action Compacts Designed to Achieve and Maintain the 8-hour Ozone Standard" ("Protocol"), revised November 2002, and the November 14, 2002 memorandum from Jeffrey Holmstead to EPA Regional Administrators is essential if areas are to remain eligible for participation in the EAC program. To ensure that the 2003 submissions and subsequent milestones will be met, we are issuing this memorandum (1) to provide State and local air pollution control agencies some general guidelines to assist them in completing the June 16, 2003 submission; (2) to clarify what should be included in the semiannual reports due in June and December 2003; and (3) to clarify several technical requirements of the program to ensure that the attainment demonstrations being developed in conjunction with the local air quality plans are representative of current information and conditions.

1. June 16, 2003 Submission

The Protocol and the November 14, 2002 Holmstead memorandum require EAC areas to identify and describe the local control measures that will be considered during the local planning process. This June 16, 2003 milestone must be met to maintain eligibility in the EAC program. This submission can be referenced in the June 2003 progress report, as described in the Section 2 of this memorandum.

We recommend that EAC areas, based on stakeholder consultation, submit by June 16, 2003 a list of candidate local control measures that is sufficient to ensure a control strategy can be developed to achieve attainment of the 8-hour ozone standard by 2007. As provided in the Protocol, areas should describe each of the local control measures under consideration.

As EAC areas prepare and subsequently analyze the June 2003 list of local measures, we advise the participants to work with stakeholders to consider carefully each of the following components needed to develop an attainment strategy:

- Local control measures that can reasonably be implemented in each area. Among the factors to consider are the resource and political constraints of that specific area;
- Realistic implementation dates for the control measures;
- The range of potential emissions reductions that will result from each control measure based on reasonably available information. (In accordance with the Protocol, these local measures must be specific, quantified, and permanent, and that if approved by EPA, will be federally enforceable SIP revisions.) A list of resources containing emissions reduction estimates for specific measures can be found in the attachment to this memorandum; and
- The geographic area to which control measures could be applied.

Any public comments received in response to the June 16, 2003 submissions will be posted on EPA's EAC website at: http://www.epa.gov/ttn/naaqs/ozone/eac/.

2. June 30, 2003 Progress Report

The Protocol requires local areas to assess and report every 6 months their progress against milestones in a regular, public process. At a minimum, the June 2003 progress report should do the following:

- Document progress in developing the stakeholder process, including the roles and responsibilities of various stakeholder groups, a list of stakeholders, and a brief summary of stakeholder meetings;
- Report progress on evaluating and selecting emission reduction measures for the local control strategy, including stakeholder involvement in the development of the initial list of control measures (The June 2003 progress report can reference the June 16, 2003 submission discussed above.);
- Describe public outreach activities (press coverage, public presentations, websites, etc.);
 and
- Provide an update on modeling/technical planning activities.

3. December 31, 2003 Progress Report

As part of the December 2003 progress report, EAC areas should address in detail each of the bulleted components discussed in section 1 above. This progress report will be an important element in EPA's consideration of whether or not to grant a deferral of the effective date of the nonattainment designation at the time of final designations in April 2004. More specifically, the progress report should address:

- A list of control measures still under consideration for adoption by the local area as part of the March 2004 submission;
- Likely implementation dates for the local control measures that are under consideration;
- Current assessment of the amount of emissions reductions expected to be achieved through implementation of the local control measures; and
- The geographical area in which each control measure is anticipated to apply.

4. Attainment Demonstration

As State and local agencies move forward to develop the modeling and other technical analyses in support of attainment demonstrations for EAC areas, they have asked EPA for clarification of the modeling guidance and its application to EAC areas. As modeling demonstrations will become part of the enforceable SIP, State and local agencies should do the following:

- Follow the most recent OAQPS modeling guidance ("Draft Guidance on the Use of Models and Other Analyses in Attainment Demonstrations for the 8-hour Ozone NAAQS," May 1999, EPA-454/R-99-004); see: http://www.epa.gov/scram001/guidance/guide/drafto3.pdf;
- Model most current emissions inventory, preferably 2002; however, if 2002 is not available, use of a 1999 or later inventory for EAC modeling is acceptable;
- Base 2007 projections on 1999 emissions inventory or later;
- Use MOBILE6 in both the current and future inventories;
- Select episodes that are representative of the area's ozone problem;
- Use appropriate assumptions and emissions analysis techniques in quantifying emissions reductions.

Please advise your States that any deviations from the above guidance need to be reviewed by and coordinated with the EPA Regional Office. For additional clarification of these and other technical requirements, State and local agencies should refer to questions and answers related to EAC modeling issues at: http://www.epa.gov/scram001/guidance/guide/eac-ozone.pdf. This document, which will be updated periodically with additional questions as necessary, provides clarification of the current modeling guidance and its application to EAC areas.

I hope this information will be helpful to you and EAC areas as they move forward to meet the swiftly-approaching milestone and semiannual reports for this year.

Any questions related to EAC policy issues should be directed to David Cole at 919/541-5565, while questions related to EAC modeling and attainment demonstration issues should be directed to Ellen Baldridge at 919/541-5684.

cc: Air Directors, Regions I, II, V, VII, IX, X
Margo Oge, OTAQ
Steve Page, OAQPS
Peter Tsirigotis, OAQPS
Joe Tikvart, OAQPS
G.T. Helms, OAQPS
Jan Tierney, OGC

ATTACHMENT Resources for Identification of Control Strategies, Emission Reduction Estimates and Emission Inventories

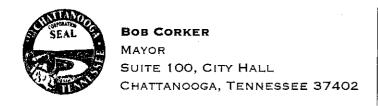
URL	Downloadable Document(s) and Websites
www.epa.gov/otaq/transp/costemis.pdf	"Summary Review of Costs and Emission Reductions for 24 CMAQ Projects" (September 1999)
www.epa.gov/otaq/transp/publicat/pub_volu.htm	"Quantification of Episodic Control Programs" (EPA420-R-97-0061, April 1997)
http://www.epa.gov/oms/transp/comchoic/sipguide.pdf	"Index of Transportation Measure Quantification Efforts: Methodology Matrix" (EPA420-R-98-018, September 1998)
http://www.epa.gov/oms/transp/comchoic/sipguide.pdf	"State Implementation Plan Development Guidance: Using Emission Reductions from Commuter Choice Programs to Meet Clean Air Act Requirements" (EPA420-R-98-007, December 1998)
www.epa.gov/otaq/transp/publicat/pub_tcms.htm	"Benefit Estimates for selected TCM Programs" (EPA420-R-98-002, July 1999)
www.epa.gov/otaq/transp/publicat/pub_tech.htm	Transportation and Air Quality ACM Technical Overviews. These documents provide overviews of individual TCMs, discussing their advantages, disadvantages, and issues involved in their implementation. Topics: Accelerated Retirement of Vehicles, Bicycle and Pedestrian Programs, Commute Alternative Incentives, Congestion Pricing, Guaranteed Ride Home, High Occupancy Vehicle Lanes, Intelligent Transportation Systems, Parking Management, Parking Pricing, Improved Public Transit, Telecommuting, Traffic Flow Improvements, Trip Reduction Ordinances, Work Schedule Changes

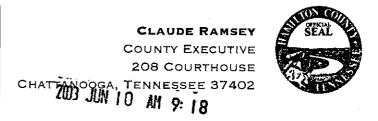
www.epa.gov/otaq/transp/publicat/pub_mrkt.htm	"Opportunities to Improve Air Quality Through Transportation Pricing Programs" (EPA420-R-97-004, July 1997)
http://www.epa.gov/otaq/transp/publicat/pub_pedo.htm	"TDM Case Studies and Commuter Testimonials" (August, 1997) Successful transportation demand management programs are described in 19 case studies.
http://www.epa.gov/dced/pdf/comparing_methodologies.pdf	"Comparing Methodologies to Assess Transportation and Air Quality Impacts of Brownfields and Infill Development" (EPA-231-R-01-001, August 2001)
PDF file will be made available on EAC website at:http://www.epa.gov/ttn/naaqs/ozone/eac/	"Methodologies for Estimating Emission and Travel Activity Effects of TCMs" (EPA-420-R-94-002, July 1994)
http://www.epa.gov/ttn/chief/	Clearinghouse for Inventories and Emission Factors, including a new draft of an update to the 1999 National Emission Inventory (March 11, 2003)
PDF file will be made available on EAC website at:http://www.epa.gov/ttn/naaqs/ozone/eac/	"Meeting the 15-Percent Rate-of-Progress Requirement Under the Clean Air Act: A Menu of Options," STAPPA/ALAPCO, September 1993.
PDF file will be made available on EAC website at:http://www.epa.gov/ttn/naaqs/ozone/eac/	"Controlling Nitrogen Oxides Under the Clean Air Act: A Menu of Options," STAPPA/ALAPCO, July 1994.
PDF file will be made available on EAC website at:http://www.epa.gov/ttn/naaqs/ozone/eac/	"Serious and Severe Ozone Nonattainment Areas: Information on Emissions, Control Measures Adopted or Planned and Other Available Control Measures," November 24, 1999.
http://www.epa.gov/otaq/voluntary.htm	EPA Website: Transportation and Air Quality Voluntary Programs, including Green Vehicle Guide, Voluntary Diesel Retrofit Program, and Commuter Choice Leadership Initiative, U.S. EPA (updated January 10, 2003)

http://www.epa.gov/otaq/transp/traqdata.htm	EPA Website: Transportation and Air Quality Planning, Clearinghouse and Databases. Includes Survey of Episodic Control Programs, Market Incentives Resource Center for Air Quality Programs, Smart Travel Resource Center, Transportation-related Grants Database, and Transportation Control Measures Program Information Directory (updated June 28, 2002)
http://www.epa.gov/otaq/transp/landguid.htm	"Improving Air Quality Through Land Use Activities." Report (EPA420-R-01-001, January 2001)
http://www.epa.gov/otaq/transp/traqtcms.htm	EPA Website on Transportation Control Measures: On-line Database; Methodologies for Estimating Emission and Travel Activity Effects of TCMs - (EPA420-R-97-004, July 1997)
http://www.trb.org	Transportation Research Board Website: Quantifying Air-quality and Other Benefits and Costs of Transportation Control Measures

CHATTANOOGA EARLY ACTION COMPACT AREA

Hamilton Marion Meigs





June 4, 2003

Barry Stephens, P.E.
Technical Secretary
Tennessee Air Pollution Control Board
9th Floor, L&C Annex
401 Church Street
Nashville, TN 37243

Subject:

Chattanooga Area Early Action Compact Control Measures

Dear Mr. Stephens:

The attached report lists control measures that will be evaluated for the use in Chattanooga EAC area to enable this area to start to demonstrate attainment with the 8-hour ozone standard by 2005. The list includes control measures that would provide more reductions than needed. This allows the EAC participants to select those controls that are practical and that will get the necessary reductions that computer modeling will show we need.

Thank you for your efforts to assist us in this endeavor.

Sincerely,

Bob Corker

Mayor

City of Chattanooga, Tennessee

PLLANT

Claude Ramsey

County Executive

Hamilton County, Tennessee

June 2003 Chattanooga EAC Milestone Report

As required by the November 14, 2002 memo from Jeffery R Holmstead and the April 4, 2002 memo from Lydia Wegman, we are submitting listing of local control measures being considered for the Chattanooga Area Early Action Compact (EAC) Area in Tennessee and North Georgia.

This EAC area contains three monitors. These are the Meigs County monitor, and two monitors in Hamilton County. The Hamilton County monitors are the Sequoyah monitor and the VAAP monitor.

Significant reductions in ozone are expected from the efforts of the State of Georgia to bring Atlanta into attainment with the 1-hour ozone standard and from the NO_x SIP call. These regional controls, including the substantial work being done by the Tennessee Valley Authority, will be in place for the ozone season of 2004. Additional reductions are expected from the transportation sector. Reductions are expected to continue through 2030 assuming that the projected vehicle miles traveled (VMT) does not increase at a rate greater than projected.

Stakeholder Involvement

Meetings with the governments of the EAC counties and with the public were held during this process. These public meetings were advertised in *The Chattanooga-Times Free Press* and in *Chattanoogan.com* a daily news publication produced in both electronic and printed versions. Public Stakeholder Meetings were held on May 19 and on June 2 with the assistance of a consultant who facilitated the entire process. These meeting were well attended by citizens, environmental organization representatives, industry, local and state government. Following deliberations, the interested stakeholders developed the following list of likely local control measures to be considered. All of the controls on this list are not expected to be adopted, but all controls on the list will be evaluated further. Additionally, it is the understanding of the stakeholders that other control measures may ultimately be included. The stakeholders recognized that additional analysis is necessary to evaluate the emissions reductions available from each control. This additional analysis is continuing.

Modeling

This EAC area is involved in ATMOS modeling. Emissions inventories necessary for modeling are developed and have been used in ATMOS modeling. Modeling has been conducted with a 1999 base year. Modeling efforts involving a 2001 episode are in progress. SAI is the contractor for the modeling.

ATMOS modeling showed that the Estimated Design Value for 2010 at the Sequoyah Tennessee monitor will be 80.76 ppb (parts per billion) and at the VAAP monitor will be 83.45 ppb. The Meigs County monitor was not in place during the baseline year of 1999 so a future year design value is not available. However, the Meigs County monitor is located close to the Sequoyah monitor. The Estimated Design Value at the Sequoyah monitor will be 83.7 ppb and at the VAAP monitor 85.1 ppb in 2007. The baseline year for the study was 1999 and the baseline year was grown to 2007. The modeling run, though not intended for use in an attainment demonstration did provide an indication of reductions necessary for attainment by 2007. The target for achieving the ozone standard by 2007 is 84.4 ppb.

Information from the Meigs county monitor was not available since it was not in place during the 1999 episode that was the baseline episode for this modeling. If the 9 cell grid around the monitors is considered for 2007 and for 2010, all Estimated Design Values are shown to be less than that required by the standard. To be in attainment

Controls List

Based on stakeholder input and the list provided by the state of Tennessee the following additional controls will be evaluated to insure that the area will be in monitoring ozone concentrations beginning in 2005 so as to demonstrate attainment by the end of 2007. Based on input from the stakeholders, the following controls were recommended.

- 1. Diesel Retrofit
- 2. Bike trails and bike racks at work sites.
- 3. Pedestrian greenways
- 4. Lower Truck Speed Limits on Interstates
- 5. Stage 1 Vapor recovery
- 6. Open Burning Restrictions
- 7. Ozone Action Days
- 8. Road Construction Congestion Mitigation Management
- 9. Encourage development of infrastructure and conversion to alternate-fuel vehicles
- 10. Support state effort to develop NOx RACT
- 11. Encourage accelerated replacement of on and off road diesel vehicles
- 12. Encourage use of catalysts and on road diesel fuel in off road diesels
- 13. Support the use of cetane diesel fuel-additive
- 14. Support lower gasoline RPV
- 15. Participate in regional initiatives to seek early introduction of ultra-low sulfur diesel fuel.
- 16. Support giving preference to bidders on state jobs with repowered, rebuilt or refueled diesel equipment.

Howell Moss

COUNTY EXECUTIVE, MARION COUNTY
P.O. BOX 789
JASPER, TENNESSEE 37347
(423) 942-2552
FAX (423) 942-1327



Barry Stephens, P.E. Technical Secretary Tennessee Air Pollution Control Board 9th Floor, L&C Annex 401 Church Street Nashville, TN 37243

Subject:

Chattanooga Area EAC Control Measures List

Dear Mr. Stephens:

The attached report lists control measures that will be evaluated for the use in Chattanooga EAC area to enable this area to start to demonstrate attainment with the 8-hour ozone standard by 2005. The list includes control measures that would provide more reductions than needed. This allows the EAC members to select those controls that are practical and that will get the necessary reductions that modeling will show we need.

Howell Moss

Marion County Executive

June 2003 Chattanooga EAC Milestone Report

As required by the November 14, 2002 memo from Jeffery R Holmstead and the April 4, 2002 memo from Lydia Wegman, we are submitting listing of local control measures being considered for the Chattanooga Area Early Action Compact (EAC) Area in Tennessee and North Georgia.

This EAC area contains three monitors. These are the Meigs County monitor, and two monitors in Hamilton County. The Hamilton County monitors are the Sequoyah monitor and the VAAP monitor.

Significant reductions in ozone are expected from the efforts of the State of Georgia to bring Atlanta into attainment with the 1-hour ozone standard and from the NO_x SIP call. These regional controls, including the substantial work being done by the Tennessee Valley Authority, will be in place for the ozone season of 2004. Additional reductions are expected from the transportation sector. Reductions are expected to continue through 2030 assuming that the projected vehicle miles traveled (VMT) does not increase at a rate greater than projected.

Stakeholder Involvement

Meetings with the governments of the EAC counties and with the public were held during this process. These public meetings were advertised in *The Chattanooga-Times Free Press* and in *Chattanoogan.com* a daily news publication produced in both electronic and printed versions. Public Stakeholder Meetings were held on May 19 and on June 2 with the assistance of a consultant who facilitated the entire process. These meeting were well attended by citizens, environmental organization representatives, industry, local and state government. Following deliberations, the interested stakeholders developed the following list of likely local control measures to be considered. All of the controls on this list are not expected to be adopted, but all controls on the list will be evaluated further. Additionally, it is the understanding of the stakeholders that other control measures may ultimately be included. The stakeholders recognized that additional analysis is necessary to evaluate the emissions reductions available from each control. This additional analysis is continuing.

Modeling

This EAC area is involved in ATMOS modeling. Emissions inventories necessary for modeling are developed and have been used in ATMOS modeling. Modeling has been conducted with a 1999 base year. Modeling efforts involving a 2001 episode are in progress. SAI is the contractor for the modeling.

ATMOS modeling showed that the Estimated Design Value for 2010 at the Sequoyah Tennessee monitor will be 80.76 ppb (parts per billion) and at the VAAP monitor will be 83.45 ppb. The Meigs County monitor was not in place

ATMOS modeling showed that the Estimated Design Value for 2010 at the Sequoyah Tennessee monitor will be 80.76 ppb (parts per billion) and at the VAAP monitor will be 83.45 ppb. The Meigs County monitor was not in place during the baseline year of 1999 so a future year design value is not available. However, the Meigs County monitor is located close to the Sequoyah monitor. The Estimated Design Value at the Sequoyah monitor will be 83.7 ppb and at the VAAP monitor 85.1 ppb in 2007. The baseline year for the study was 1999 and the baseline year was grown to 2007. The modeling run, though not intended for use in an attainment demonstration did provide an indication of reductions necessary for attainment by 2007. The target for achieving the ozone standard by 2007 is 84.4 ppb.

Information from the Meigs county monitor was not available since it was not in place during the 1999 episode that was the baseline episode for this modeling. If the 9 cell grid around the monitors is considered for 2007 and for 2010, all Estimated Design Values are shown to be less than that required by the standard.

Controls List

Based on stakeholder input and the list provided by the state of Tennessee the following additional controls will be evaluated to insure that the area will be in monitoring ozone concentrations beginning in 2005 so as to demonstrate attainment by the end of 2007. Based on input from the stakeholders, the following controls were recommended.

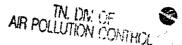
- 1. Diesel Retrofit
- Bike trails and bike racks at work sites.
- 3. Pedestrian greenways
- 4. Lower Truck Speed Limits on Interstates
- 5. Stage 1 Vapor recovery
- 6. Open Burning Restrictions
- 7. Ozone Action Days
- 8. Road Construction Congestion Mitigation Management
- 9. Encourage development of infrastructure and conversion to alternate-fuel vehicles

- 10. Support state effort to develop NOx RACT
- 11. Encourage accelerated replacement of on and off road diesel vehicles
- 12. Encourage use of catalysts and on road diesel fuel in off road diesels
- 13. Support the use of cetane diesel fuel-additive
- 14. Support lower gasoline RPV
- 15. Participate in regional initiatives to seek early introduction of ultra-low sulfur diesel fuel.
- 16. Support giving preference to bidders on state jobs with repowered, rebuilt or refueled diesel equipment.



MEIGS COUNTY, TENNESSEE

OFFICE OF COUNTY EXECUTIVE DECATUR, TENNESSEE 37322



2003 MAY 28 AM IO: BG Box 156 Decatur, Tennessee 423-334-5850

PECFIVEN

May 27, 2003

Barry R. Stephens Department of Environment and Conservation Division of Air Pollution Control 401 Church Street, L & C Annex, 9th Floor Nashville, TN 37243-1531

Dear Mr. Stephens:

Please find enclosed list of Likely Control Measures for Meigs County per your request.

If there is any thing more you need, please contact our office.

Sincerely,

Tami A. Elliott

Administrative Assistant Meigs County Executive

ami Elliott

Enclosure (s)

LIST OF LIKELY CONTROL MEASURES FOR

MEIGS COUNTY

COUNTY NAME

For the Early Action Compact, the signatory below agrees to the attached list of likely control measures for the above county. All other signatories shall sign below or attach pages as appropriate.

County Executive

ITLE

May 23, 200

LIST OF EAC CONTROL MEASURES

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory	L=Local
Mobile	Local governments investigate Installation of fuel infrastructure and Conversion of local government fleets to alternative fueled vehicles	NOx, VOC, CO	M	V=Voluntary R,V	S=Statewide L
Gasoline refueling stations	Implement or expand Stage I and or Stage II in all MSA counties	Voc	s	R	L and/or S
On-road HDDV and Buses	Encourage accelerated replacement with newer lower emitting vehicles	NOx, VOC, CO	М	V	L and/or S
On and Off Road Diesel Vehicles	Encourage accelerated replacement with newer lower emitting vehicles	NOx, VOC, CO	М	V	L and/or S
On and Off Road Diesel Vehicles	Encourage use of catalysts and low sulfur diesel	NOx,	М	V	L and/or S
On and Off Road Diesel /ehicles	Support the use of Cetance diesel fuel additive	NOx,	М	R	L and/or S
Fleet Vehicles	Propose accelerated replacement with newer lower emmitting vehicles or with vehicles using cleaner fuels	NOx, VOC, CO	М	V	L and/or S
HDDV and ouses	Truck stop electrification/Anti-idling regulation	NOx, VOC, CO	М	V/R	L.
Open burning	Open burning ba—perhaps on ozone action days (or for the ozone season)	NOx,	s	R	L
On-road vehicles	Transportation management plan for large employers	NOx, VQC, CO	М	v	L

LIST OF EAC CONTROL MEASURES

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=Statewide
On-road vehicles	Area wide rideshare incentives	NOx, VOC, CO	М	V	L
On-road vehicles	Support the enforcement of the smoking vehicle reg. Similar to Davidson County to remove gross emitters from road	NOx, VOC, CO	M	R	L and/or S
All gasoline engines	Support lower gasoline RVP	VOC	M	R	s
All diesel engines	Participate in a regional initiative to seek early introduction of ultralow sulfur diesel fuel	NOx, VOC, CO	M	R, V	L or S
TDOT	Support giving preference to bidders on state jobs with repowered, rebuilt or refueled diesel equipment	NOx, VOC, CO	М	R	S
		· · · · · · · · · · · · · · · · · · ·			

HAYWOOD COUNTY EARLY ACTION COMPACT

LIST OF LIKELY CONTROL MEASURES FOR

HAYWO	pod Cou	NTY
COT	JNTY NAME	
For the Early Action Compact, the control measures for the above coupages as appropriate.	signatory below agrees to to nty. All other signatories s	he attached list of likely hall sign below or attach
Ban7Shaya, R	Hayuood Oi	6/11/3 DATE
Other signatories are as follows:		
Fred D. Rusull	County Commission	U 4/9/03 DATE
Roji Castellar NAME	City of Brownswill <u>Utilities</u> TITLE	<u>06-09-03</u> Date
well FBanks	mayor ais & Brown	mtl 0 4-04-0 3
NAME	TITLE	DATE

Haywood County, Tennessee Potential EAC Control Measures

- 1. Truck stop electrification/Anti-idling regulation
- 2. Discuss with local school board/anti-idling regulation
- 3. Encourage city/county and local school board to use cleaner fuels
- 4. Support giving preference to bidders on state jobs with re-powered, rebuilt or refueled diesel equipment
- 5. Open burning/only on Ozone Action Days
- 6. Propose an air quality Action Day in conjunction with Earth Day
- 7. Public education at community events
- 8. Support the enforcement of the smoking vehicle regulation to remove gross emitters from road
- 9. Support federal legislation to enhance (Air Quality Standards)
- 10. Student outreach through education systems; educate future drivers on the impact of motor vehicles on the environment

KNOXVILLE EARLY ACTION COMPACT AREA

Anderson

Blount

Jefferson

Knox

Loudon

Sevier

Union



OFFICE OF COUNTY EXECUTIVE, MIKE RAGSDALE

400 Main Street, Suite 615, Knoxville TN 37902

June 4, 2003

Mr. Barry Stephens, P.E.

Director

Division of Air Pollution Control

9th Floor, L & C Annex

401 Church Street

Nashville, TN 37243-1531

Dear Mr. Stephens:

This correspondence contains the signed signatory page from each of the seven county mayors under the Early Action Compact and a list of possible ozone control measures for the seven counties. The submittal of this list however does not at this time commit these counties to implementing any or all of these measures. It is understood that each county will attempt to implement as many activities as are necessary to meet the goal of attainment for the air quality standards.

Attached as supplemental information are the following:

- Newspaper advertisements and articles concerning the April 25, 2003
 Regional Clean Air Action Summit
- Program for the Summit
- Attendees at the Summit
- List of actions considered in the breakout groups at the Summit
- Notes from discussion at the Tennessee Air Quality Roundtable held on April 14, 2003
- Draft plan for the formation of a 12 county area Ozone Action Program in East Tennessee

The seven county mayors who signed the Early Action Compact are committed to work together regionally to address our air quality issues. We plan to also involve other counties in our region as we seek solutions.

Page 2, Mr. Barry Stephens, P.E.

Should you require additional information, or if I may be of assistance, please call.

Sincerely,

Michael Ragsdale Knox County Mayor

cc: Rex Lynch, Anderson County Mayor
Beverley Woodruff, Blount County Mayor
Iliff McMahan, Cocke County Mayor
Paul Merritt, Grainger County Mayor
Gary Holiway, Jefferson County Mayor
George Miller, Loudon County Mayor
Allan Watson, Monroe County Mayor
Ken Yager, Roane County Mayor
Dwight Murphy, Scott County Mayor
Larry Waters, Sevier County Mayor
Larry Lay, Union County Mayor

LIST OF LIKELY CONTROL MEASURES FOR

Knox County

For the Early Action Compact, the signatory below agrees to the attached list of likely control measures for the above county. All other signatories shall sign below or attach pages as appropriate.

NAME

Knox County Mayor

TITLE

06-03-03

DATE

LIST OF LIKELY CONTROL MEASURES FOR

Anderson County

For the Early Action Compact, the signatory below agrees to the attached list of likely control measures for the above county. All other signatories shall sign below or attach pages as appropriate.

Anderson County Executive

BLOUNT

LIST OF LIKELY CONTROL MEASURES FOR

	COUNTY NAME	
For the Early Action Control measures for the pages as appropriate.	ompact, the signatory below a e above county. All other sign	grees to the attached list of likely natories shall sign below or attac
XJenasty D.	Winder W	DATE DATE
Other signatories are as	follows:	
NAME	TITLE	DATE
NAME	TITLE	DATE
NAME	TITLE	DATE
NAME	TITLE	DATE .
NAME	TITLE	DATE

JEFFERSON

LIST OF LIKELY CONTROL MEASURES FOR

	CO	UNTY NAME	
For the Early Action control measures for pages as appropriate.	Compact, the the above cou	signatory below agrees to inty. All other signatories	the attached list of likely shall sign below or attac
Say V. Joh	- O	County Executive TITLE	May 23, 2003 DATE
Other signatories are a	as follows:		
NAME	······································	TITLE	DATE
NAME		TITLE	DATE
NAME		TITLE	DATE
NAME		TITLE	DATE
IAME		TITLE	DATE

LIST OF LIKELY CONTROL MEASURES FOR

LOUDON COUNTY

For the Early Action Compact, the signatory below agrees to the attached list of likely control measures for the above county. All other signatories shall sign below or attach pages as appropriate.

NAME Loudon County Executive 06/05/03

TITLE DATE

LIST OF LIKELY CONTROL MEASURES FOR **SEVIER COUNTY**

For the Early Action Compact, the signatory below agrees to the attached list of likely control measures for the above county. All other signatories shall sign below or attach pages as appropriate.

LIST OF LIKELY CONTROL MEASURES FOR

UNION COUNTY

For the Early Action Compact, the signatory below agrees to the attached list of likely control measures for the above county. All other signatories shall sign below or attach pages as appropriate.

Union County Mayor

TITLE

DATE

LIST OF EAC CONTROL MEASURES

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=Statewide
Mobile					
LDGV, HDGV	Support evaluation of an IM program EAC-wide or Statewide	NOx,VOC,	M	R :	L and/or S
Mobile LDV	Free gas cap replacement program (in conjunction with IM)	VOC	M	R	L and/or S
Mobile	Local governments investigate installation of fuel infrastructure and conversion of local government fleets to alternative fueled vehicles	NOx, VOC, CO	M	R, V	L
Gasoline					
refueling stations	Implement or expand Stage I and or Stage II in all MSA counties	VOC	S	R	L and/or S
Stationary NOx sources	Support statewide NOx RACT Low NOx combustion controls	NOx	S	R	L and/or S
On-road HDDV and Buses	Encourage accelerated replacement with newer lower emitting vehicles	NOx, VOC,CO	М	V	L and/or S
On and Off Road Diesel Vehicles	Retrofitting local government vehicles (diesel fleets including school buses)	NOx, VOC, CO	M	R, V	
On and Off Road Diesel Vehicles	Encourage accelerated replacement with newer lower emitting vehicles	NOx, VOC,CO	М	V	L and/or S
On and Off Road Diesel Vehicles	Encourage use of catalysts and low sulfur diesel	NOx	М	V	L and/or S

				—	<u> </u>
Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=Statewide
On and Off Road Diesel Vehicles	Support the use of Cetane diesel fuel additive	NOx	М	R	L and/or S
Fleet Vehicles	Propose accelerated replacement with newer lower emitting vehicles or with vehicles using cleaner fuels	NOx, VOC,CO	М	V	L and/or S
On-road vehicles	Traffic signalization/synchronization	NOx, VOC,CO	M	V	L
On-road vehicles	Roadside assistance/Incident management program	NOx, VOC,CO	M	V	L
HDDV and buses	Truck stop electrification/Anti-idling regulation	NOx, VOC,CO	М	V/R	L
All categories	Air Quality Action Day (AQAD)	NOx, VOC,CO	С	V	L and/or S
Open burning	Open burning banperhaps on ozone action days	NOx, VOC,CO	S	R	L
On-road HDDV trucks	Support reducing speed limit on ozone action days (or for the ozone season)	NOx	М	V	L and/or S
On-road vehicles	Transportation management plan for large employers	NOx, VOC,CO	М	V	L
On-road vehicles	Area wide rideshare incentives	NOx, VOC,CO	M	V	L
On-road vehicles	Support the enforcement of the smoking vehicle reg. similar to Davidson County to remove gross emitters from road	NOx, VOC,CO	M	R	L and/or S

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=Statewid
All gasoline				- Totalitary	o-otatewic
engines	Support lower gasoline RVP	VOC	M	R	S
All diesel engines	Participate in a regional initiative to seek early introduction of ultra- low sulfur diesel fuel	NOX, VOC, CO	М	R, V	L or S
TDOT	Support giving preference to bidders on state jobs with repowered, rebuilt or refueled diesel equipment	NOx, VOC,CO	М	R	S
Trip Reductions	Employer-based trip reduction plans	NOx, VOC, CO	М	· V	L and/or S
All	Student outreach through education systems; educate future drivers on the impact of motor vehicles on the environment	NOx, VOC, CO	М	V	L
All	Public education at community events	NOx, VOC, CO	С	V	L
All	Air quality web page/public information	NOx, VOC, CO	C	V	L.
OTHERS					



JEFFERSON COUNTY, TENNESSEE

GARY W. HOLIWAY, COUNTY EXECUTIVE

P. O. Box 710

Dandridge, Tennessee 37725

Phone: 865 / 397-3800

May 23, 2003

Barry R. Stephens, Director Division of air Pollution Control 401 Church Street, L & C Annex, 9th Floor Nashville, TN 37243-1531

RE: Submission of Likely Control Measures

Dear Mr. Stephens:

Enclosed is a list of the possible control measures which has been selected as areas that will best benefit the future of Jefferson County to control air pollution. From the list of EAC Control Measures I have indicated the areas of consideration.

If I can further assist you with this matter, please feel free to contact me.

Sincerely

Gary W. Holiway

County Executive

GWH:ks

LIST OF EAC CONTROL MEASURES

	Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=Statewide
	Mobile LDGV, HDGV	Support evaluation of an IM program EAC-wide or Statewide	NOx,VOC,	М	R	L and/or S
·	Mobile LDV	Free gas cap replacement program (in conjunction with IM)	VOC	M .	R	L and/or S
*	Mobile	Local governments investigate installation of fuel infrastructure and conversion of local government fleets to alternative fueled vehicles	NOx, VOC, CO	M	R, V	L
	Gasoline refueling stations	Implement or expand Stage I and or Stage II in all MSA counties	VOC	S	R	L and/or S
	Stationary NOx sources	Support statewide NOx RACT Low NOx combustion controls	NOx	S	R	L and/or S
	On-road HDDV and Buses	Encourage accelerated replacement with newer lower emitting vehicles	NOx, VOC,CO	М	·V	L and/or S
K	On and Off Road Diesel Vehicles	Retrofitting local government vehicles (diesel fleets including school buses)	NOx, VOC, CO	M	R, V	
X	On and Off Road Diesel Vehicles	Encourage accelerated replacement with newer lower emitting vehicles	NOx, VOC,CO	М	V	L and/or S
	On and Off Road Diesel Vehicles	Encourage use of catalysts and low sulfur diesel	NOx	M	V	L and/or S

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=Statewide
On and Off Road Diesel Vehicles	Support the use of Cetane diesel fuel additive	NOx	M ·	R	L and/or S
Fleet Vehicles	Propose accelerated replacement with newer lower emitting vehicles or with vehicles using cleaner fuels	NOx, VOC,CO	M	V	L and/or S
On-road vehicles	Traffic signalization/synchronization	NOx, VOC,CO	M	V	L
On-road vehicles	Roadside assistance/Incident management program	NOx, VOC,CO	M	V	L
HDDV and buses	Truck stop electrification/Anti-idling regulation	NOx, VOC,CO	M	V/R	L
All categories	Air Quality Action Day (AQAD)	NOx, VOC,CO	C	V	L and/or S
Open burning	Open burning banperhaps on ozone action days	NOx, VOC,CO	S	R	L
On-road HDDV trucks	Support reducing speed limit on ozone action days (or for the ozone season)	NOx	М	V	L and/or S
On-road vehicles	Transportation management plan for large employers	NOx, VOC,CO	M	V	L
On-road vehicles	Area wide rideshare incentives	NOx, VOC,CO	M	V	L
On-road vehicles	Support the enforcement of the smoking vehicle reg. similar to Davidson County to remove gross emitters from road	NOx, VOC,CO	M	R	L and/or S

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=Statewide
All gasoline					
engines	Support lower gasoline RVP	voc	. M	R	s
All diesel engines	Participate in a regional initiative to seek early introduction of ultra- low sulfur diesel fuel	NOX, VOC, CO	M	R, V	L or S
TDOT	Support giving preference to bidders on state jobs with repowered, rebuilt or refueled diesel equipment	NOx, VOC,CO	М	R	S
Trip Reductions	Employer-based trip reduction plans	NOx, VOC, CO	M	V	L and/or S
All	Student outreach through education systems; educate future drivers on the impact of motor vehicles on the environment	NOx, VOC, CO	M	V	L
All	Public education at community events	NOx, VOC, CO	С	V	L
All	Air quality web page/public information	NOx, VOC, CO	С	V	L
OTHERS				·	
· · · · · · · · · · · · · · · · · · ·					



LAWRENCE COUNTY EARLY ACTION COMPACT

Ametra Bailey

Lawrence County Executive

RECEIVED
JUN 0 6 2003

NBU#1 240 W. Gaines Street Lawrenceburg, TN 38464

Phone(931)762-7700 Fax (931)766-2219

June 5, 2003

Mr. Barry Stephens
State of Tennessee
Department of Environment & Conservation
Division of Air Pollution Control
401 Church Street, L & C Annex, 9th Floor
Nashville, TN 37243-1531

Dear Mr. Stephens:

On behalf of Lawrence County I would like to opt out of the ozone EAC.

Thank you,

Ametra Bailey County Executive Lawrence County

Cc: Kay Prince

MEMPHIS EARLY ACTION COMPACT AREA

Fayette Shelby Tipton



Fayette County Government

Rhea Taylor / County Mayor

June 6, 2003

Mr. Barry Stevens
Tennessee Department of Environment and Conservation
Division of Pollution Control
9th Floor, L&C Annex
401 Church Street
Nashville, TN 37243-1531

TO JUN []

Dear Mr. Stevens:

Enclosed, please find a list of Fayette County's recommended strategy options for the State of Tennessee and Memphis Local Areas Early Action Compact. Please include the attached list with your submittal to the Environmental Protection Agency (EPA) of local control measures being considered. I would appreciate receiving a copy of the final June 16th submittal to EPA and also the June 23rd Initial Progress Report for the Memphis Area Early Action Compact.

If I can be of any further assistance, please do not hesitate to contact me.

Sincerely,

Rhea "Skip" Taylor, Mayor Fayette County, Tennessee

EARLY ACTION COMPACT RECOMMENDED 8-HOUR CONTROL STRATEGY OPTIONS FOR FAYETTE COUNTY, TENNESSEE MEMPHIS METROPOLITAN STATISTICAL AREA

- 1. Low RVP (7.8 psi) gasoline (at refinery)
- 2. Stage I vapor recovery (at fueling stations)
- 3. Electric or propane-fueled forklifts
- 4. Ozone Alert program: Drive 55
- 5. Gas cap for vehicles giveaway
- 6. Lower speed limit from 70 to 55 mph for heavy duty (18 wheel) trucks during ozone season and increased enforcement
- 7. Intelligent Transportation System (electronic signs on roadway provide real time info to drivers)
- 8. Use TDOT "enhancements" grants to link greenways/bikeways/bike racks/pedestrian walkways
- 9. Adopt open burning restrictions during peak ozone periods
- 10. Provide the public with information through education programs and community events
- 11. Develop an air quality web page to provide the public with information
- 12. Encourage the use of catalyst and low sulfur diesel
- 13. Encourage car pooling and the use of area wide ride share incentives



CITY OF MEMPHIS AND SHELBY COUNTY TENNESSEE,



June 6, 2003

Barry R. Stephens, P.E. Technical Secretary Tennessee Air Pollution Control Board 9th Floor, L & C Annex 401 Church Street Nashville, TN 37243-1531

SUBJECT:

Memphis Metropolitan Statistical Area

Early Action Compact

June 16th List of Control Measures Under Consideration

Dear Mr. Stephens:

In accordance with the Early Action Compact entered into by Memphis and Shelby County in December, 2002, the attached list is hereby submitted. The West Memphis, Arkansas Metropolitan Planning Organization has submitted a list of recommended strategy options for possible implementation in Crittenden County, Arkansas. DeSoto County, Mississippi will also submit a list. It is our understanding that you will present the lists to the Tennessee Air Pollution Control Board at its June 11th meeting and forward them to U.S. EPA Region IV by the June 16th milestone deadline in the Early Action Compact.

We will continue to participate in the stakeholder process to develop an area wide plan. I certify that I have the necessary authority to submit this list.

Sincerely,

AC Wharton, Jr.

Mayor

Dr. Willie W. Herenton

Mayor

Cc: Yvonne Madlock, Director, Memphis & Shelby County Health Department

John Fowlkes, CAO, Shelby County

Keith L. McGee, Interim CAO, City of Memphis

Diane Arnst, Pollution Control, Memphis & Shelby County Health Department

Carter Gray, MPO

Kay Prince, U.S. EPA Region IV

MEMPHIS & SHELBY COUNTY COMPONENT OF LIST OF CONTROL MEASURES BEING CONSIDERED FOR EARLY ACTION COMPACT FOR MEMPHIS METROPOLITAN STATISTICAL AREA

SEPARATE LISTS TO BE SUBMITTED BY DESOTO COUNTY, MISSISSIPPI; CRITTENDEN COUNTY, ARKANSAS; FAYETTE COUNTY and TIPTON COUNTY, TENNESSEE June 16, 2003

FUEL STRATEGIES

- 1. Will work with Premcor Refining Group, Inc. and other suppliers and with the MSA counties outside of Shelby County to determine if Low Reid Vapor Pressure (7.8 psi) gasoline supply can be expanded to Crittenden, DeSoto, Tipton and Fayette Counties during ozone season [already required within Shelby County]

 Status: Meeting with Premcor Refining Group, Inc. scheduled June 9th; Lion Oil spokesman (Arkansas) stated 5/14 that it could not supply this fuel in this timeframe
- 2. Stage I Vapor Recovery expanded beyond Shelby County at fueling stations [already required within Shelby County]

 Status: Would require ordinances; may require statutory changes; would require infrastructure changes; probably could be implemented by 2005.. Cost approximately \$400 per tank
- Low Sulfur Gasoline to Memphis MSA by May 1, 2005
 Status: Meeting with Premcor Refining Group, Inc. scheduled June 9th to discuss
- 4. Stage II Vapor Recovery at fueling stations

 Status: Cost approximately \$1,200/TON of VOCs reduced. Also reduces hazardous air pollutant emissions from fuels. May be viewed as duplicative of onboard canisters on newer model cars
- 5. Cetane Additive at diesel terminal distribution point

 Status: Cost approximately \$4,00/TON of NOx reduced; determination of credit to local area issue; infrastructure needed for fuel mixing; pilot program summer 2004 in East Tennessee
- 6. BioDiesel (plant oil added at diesel terminal distribution point)
 <u>Status</u>: Adds NOx but reduces VOCs; determination of credit to local area issue; infrastructure needed for fuel mixing; may add \$ 0.30 to \$2.00 per gallon to consumer
- 7. Federal Reformulated Gas Opt-In

 Status: Governor must apply under Clean Air Act Section 211(k)(6) for classified nonattainment area; unclear if available to deferred Early Action Compact areas; may be more effective for carbon monoxide reduction strategy than for ozone reduction; Premcor Refining Group, Inc. spokesman stated 5/14 that this would be the toughest fuel to supply locally
- 8. BioDiesel and fuelborne catalyst (plant oil and catalyst added at diesel terminal distribution point)

 Status: Determination of credit to local area issue; infrastructure needed for fuel mixing
- 9. Diesel Fuel Emulsions (water based fuel additive at diesel terminal distribution point)

Status: Reduces horsepower and fuel economy so industry resistance is expected to be high; determination of credit to local area issue; infrastructure needed for fuel mixing; may add \$0.35 to \$3.00 per gallon

NOTE: Mandatory local fuel strategies require an EPA Fuel Waiver under Clean Air Act Section 211(c)(4)(B). EPA can grant waiver only "if no other measures that would bring about timely attainment exit, or if other measures exist and are technically possible to implement but are unreasonable or impracticable." Time to obtain Fuel Waiver is lengthy. Voluntary local fuel strategies do not need waiver, but only 7% of target reductions could be voluntary for the Early Action Compact.

STATIONARY SOURCE STRATEGIES

- 1. Fogging at 4 large and 16 small Combustion Turbines at TVA Allen Steam Plant. Reduces NOx emissions by about 10% when Combustion Turbines are in use, ambient temperature is over 70 degrees Farenheit, and humidity is 80% or less Status: Fogging devices have been installed beginning 1998 and ending 2002 on all 20 Combustion Turbines and are now in use when Combustion Turbines are in use, per TVA Allen Steam Plant spokesmen 5/30. TVA to provide data to quantify NOx emissions reductions for credit and for attainment modeling purposes. TVA to provide cost per ton of emissions reduction figures.
- Wet injection at Combustion Turbines at TVA Allen Steam Plant to reduce NOx by about 40% to about 60 ppm Status: Memphis & Shelby County Health Department obtaining permission of Arkansas-Tennessee-Mississippi Ozone Study Operations Committee for contractor SAI, Inc. to release data to Larry Gautney of TVA to model emissions impacts before TVA Allen Steam Plant commits to this strategy. Modeling results expected about July 15th if data is provided to TVA first week of June. TVA to provide cost per ton of emissions reduction figures.
- 3. Operate Selective Catalytic Reduction equipment for three EGUs covered by NOx SIP call on specified days in April and October each year IF Pollution Control Section forecasts an ozone exceedance for the next day OR if Pollution Control Section observes at 8 AM that overnight ozone levels remained high. Forecaster to advise Technical Manager and PAS-Executive, who telephone TVA [Ozone Action Plan approach]
 - Status: Spokesmen for TVA Allen Steam Plant agreed 5/30 to model this strategy before it commits to this strategy. SCR can be in operation within 2 or 3 hours after notification to TVA; cost per day is about \$10,000; TVA to provide cost per ton of emissions reduction figures. Health Department reviewed historical data to determine typical date of 4th highest 8-hour ozone value each ozone season and provided to TVA on 6/2.
- 4. Will work with the MSA counties outside of Shelby County on early implementation of NOx Reasonably Available Control Technology (RACT) in MSA

 Status: Ordinance revisions needed for this longterm strategy for new/replacement sources of NOx; effective for Early Action Compact 2007 deadline if a retrofit requirement and effective for maintenance through 2012.
- 5. DriveMax programmable computer installed on diesel engines for tub grinders at mulching operations to reduce NOx

- Status: Need to inventory mulching operations to determine number of engines and quantify possible reductions
- 6. Electric or propane-fueled forklifts

 Status: Memphis Light, Gas & Water has seven (7) electric forklifts and sixteen

 (16) diesel forklifts. Need to inventory MSA to determine number, useful life, and to quantify possible NOx reductions
- 7. Compressor station diesel engines at natural gas pipelines SIC Code 4922 or 4923

 Status: Texas Gas Transmission, LLC on 6/2/03 orally committed to

 Memphis & Shelby County Health Department to complete a programming
 change on computers that operate eight (8) reciprocating compressors to operate at
 90% of rated load no later than start of ozone season 2004 at its Covington facility
 in Tipton County TN to reduce average annual ozone season NOx
 reductions by 149 TONS and to achieve similar further NOx reductions of 83 TPY
 elsewhere in the MSA, which would achieve NOx emissions reductions of
 approximately 235 TONS Per Year (1.09 TONS Per DAY) from April 1st
 through October 31st. Darrell Morgan of Texas Gas Transmission, LLC submitted
 written calculations to the Health Department, The Health Department will work
 with the Tennessee Department of Environment and Conservation on any related
 permitting issues.

On May 23, 2003, EPA received a notice of intent to sue from the Georgia Sierra Club for EPA's failure to promulgate the NOx SIP Phase II rule, according to Kay Prince, EPA Region IV. This rule would achieve 82% to 90% reduction in NOx from natural gas transmission pipeline compressor engines in the twenty-two (22) NOx SIP Call states, which include Tennessee but not Mississippi. First year in which emissions reductions would occur is unknown. Tennessee Department of Environment and Conservation is reviewing its emission inventory for this source category and may consider a statewide control strategy in the interim if tens of thousands of NOx emissions are attributable from this source category as anticipated..

VOLUNTARY MEASURES

- Ozone Alert Program: Drive 55
 Status: Need to work on publicity and tie in ozone forecasts and with Intelligent Transportation System
- Gas cap for vehicles giveaway
 Status: Need to approach Autozone to flesh out this idea. Could tie in with I/M inspection stations or Clean Air Month event at start of ozone season

FLEET STRATEGIES

1. Fleet ULEV or SULEV Program (Buses, taxi, private, utility, airport ground)

Status: Federal Express announced 5/23 phase-in of a hybrid diesel/electric E700

truck (medium delivery truck size) into its fleet of 30,00 nationwide. First phase is 20

trucks in 4 cities; Memphis is being considered. Truck manufacturer Eaton states

E700 trucks are 45% more fuel-efficient and emit 75% less smog-forming gases and

90% fewer particulates. Cost is 10% to 20% more than conventional diesel, offset by lower fuel costs. Trucks are replaced every 10-12 years. Congressional tax credits are pending. Regenerative braking and a particulate trap are the controls. Timing for conversion of entire Memphis fleet will not coincide with 2007 deadline, but is an effective longterm strategy for 2012 maintenance. *Memphis Light Gas & Water* (MLGW) has one (1) hybrid electric car, 900 light-duty diesel onroad vehicles, 370 heavy duty diesel vehicles, and 684 offroad diesel vehicles. MLGW has begun to purchase cleaner half-ton trucks with a specified number to be purchased per year, VMT/year/truck]

VEHICLE INSPECTION AND MAINTENANCE (I/M) STRATEGIES

- Basic I/M, measuring hydrocarbons and carbon monoxide from tailpipe exhaust only; plus gas cap check of evaporative emission control system <u>Status</u>: Need to examine cost of adding gas cap check at existing stations; need to estimate cost/ton of reduced emissions; significant resistance expected to expanding throughout MSA; funding problems expected
- 2. I/M tailpipe test and ASM/IM240 while vehicle is driven on a treadmill-like device (a dynamometer) over a driving cycle with many different speeds resembling typical city driving; measures hydrocarbon, carbon monoxide and nitrogen oxides emissions from entire exhaust stream; also measures fuel economy and generates diagnostic information targeting repairs needed

 Status: Need to examine cost of adding ASM/IM240 at existing stations; need to estimate cost/ton of reduced emissions; significant resistance expected to expanding throughout MSA; funding problems expected
- 3. ASM/IM240 test plus gas cap check with 5% waiver rate

 Status: Need to examine cost of adding ASM/IM240 at existing stations; need to estimate cost/ton of reduced emissions; significant resistance expected to expanding throughout MSA; funding problems expected
- 4. Onboard Diagnostics II: test of 1996 and newer model year vehicle OBD computer systems for proper functioning in addition to tailpipe test for these model years.

 Status: Statutory ordinance changes may be required to authorize use of "hand scanner" equipment inside automobile or inside engine hood of privately owned automobiles. Cost to add "hand scanners to the three existing I/M stations [10 lanes, 2 mobile units, and 5 spare units] estimated at \$60,000 plus subsequent software upgrades.
- 5. Remote Sensing outside City of Memphis limits

 Status: Need to determine cost and number of devices required to have an effective program; quantification of emissions reductions issue; privacy issue

ENERGY EFFICIENCY STRATEGIES

- 1. Memphis Light, Gas & Water Energy Audits of residential buildings "Energy Doctor Program"
 - <u>Status</u>: MLGW is gathering data concerning the number of residences per year audited and resulting emissions reductions per house
- 2. Memphis Light, Gas & Water Energy Audits of commercial buildings

- Status: MLGW is gathering information about start date of this new program and expected emissions reductions
- Adopt International Energy Conservation Code and energy efficiency chapter of International Residential Code into Local Building Codes <u>Status</u>: Longterm strategy to maintain to 2012; ordinance revisions necessary; need to obtain copy of it and solicit public comments; dovetails with Smart Growth

TRAVEL BEHAVIOR STRATEGIES

- 1. Lower Speed Limit from 70 to 55 mph for Heavy Duty (18-Wheel) Trucks during Ozone Season and increase enforcement

 Status: Representatives of Tennessee Department of Environment and Conservation began meeting in May with Tennessee Department of Transportation officials to discuss Early Action Compact strategies; safety benefits; TDOT increased speed limit in 2003 to 65 mph for all traffic on I-240; possible resistance from trucking industry; unclear if TDOT can accomplish or if State legislature must act; may need additional funding for additional enforcement
- Intelligent Transportation System (electronic signs on roadway provide real time information to drivers that reduces congestion <u>Status</u>: Already funded for completion by 2006; determination of emission reduction credit issue
- Use TDOT "enhancements" grants to link greenways/bikeways/bike
 racks/pedestrian walkways
 Status: Dovetails with Smart Growth; MPO ranking during grant cycle; current 3year Transportation Improvement Plan timeframe; quantification of emissions
 reduction issue

MOTOR VEHICLE STRATEGIES

- NOx flash (recalibrate diesel engine fleets to lowest NOx emission rate)
 <u>Status</u>: Need to quantify for Memphis Federal Express fleet where this was completed to claim credit; approximately \$1,000 cost/ton reduced
- Diesel Retrofit of On-Road vehicles with catalytic converters after low sulfur diesel fuel is available
 <u>Status</u>: Low sulfur diesel fuel availability federal deadline is 1/1/06; retrofit is eligible for federal Congestion Mitigation and Air Quality (CMAQ) Improvement funds and for federal Toyota Settlement funds; cost estimated at \$4,000 to \$12.000/Ton of NOx reduced
- 3. Diesel Retrofit of Off-Road vehicles with catalytic converters after low sulfur diesel fuel is available <u>Status</u>: Low sulfur diesel fuel availability federal deadline is 1/1/06; retrofit is eligible for federal Congestion Mitigation and Air Quality (CMAQ) Improvement funds and for federal Toyota Settlement funds; cost estimated at \$4,000 to \$12,000/Ton of NOx reduced
- 4. Local government contract preference for bidders with retrofitted diesel engines

- Status: Need to pursue after 1/1/06 availability of low sulfur diesel fuel; emission reduction quantification issue
- 5. Install DriverMax programmable computers on buses

 Status: Already installed on MATA Paratransit buses; need to quantify for NOx reduction credit; consider for larger buses during MATA budget cycle; may be eligible for CMAQ funding
- Liquified Natural Gas for Railroad Switch Engines
 Status: Need to inventory to determine number, useful life, and to quantify possible NOx reductions
- 7. Truck idling emissions reduction through truckstop electrification

 Status: Pilot at one truckstop in West Memphis, AR by private sector; strategy may also be useful for fleets garaged in Memphis MSA; CMAQ project underway in Knoxville (Supplier: Idleair, Inc.) to install at 100 parking spaces for \$1 million; operating expense subsidy to truck driver for per night charge up to 3 years is also eligible for CMAQ funding; estimated \$1,660 /Ton of NOx reduced

EMPLOYER-BASED STRATEGIES

- Pay taxable cash compensation in lieu of non-taxable parking benefit of up to \$175/month pursuant to Section 132 of IRS Code, Section 1072 of Taxpayer Relief Act of 1997
 - Status: Need to track by employer, quantification of emission reductions issue
- 2. Provide employee Transit Passes of up to \$65/month Tax Free De Minimis Fringe Benefit pursuant to Section 132 of IRS Code
 - Status: Need to track by employer; quantification of emission reductions issue
- 3. Provide a Commuter Highway Vehicle for employees pursuant to Section 132 of IRS Code
 - Status: Need to track by employer, quantification of emission reductions issue
- 4. Flexible work hours and telecommuting
 Status: Need to track by employer; quantification of emission reductions issue

TIPTON COUNTY

JEFF HUFFMAN COUNTY EXECUTIVE PHONE (901) 476-0200 FAX: (901) 476-0227

June 11, 2003



Mr. Barry Stevens
Tennessee Department of Environment and Conservation
Division of Pollution Control
9th Floor, L & C Annex
401 Church Street
Nashville, TN 37243-1531

Dear Mr. Stevens:

Enclosed, please find a list of Tipton County's recommended strategy options for the State of Tennessee and Memphis Local Ares Early Action Compact. Please include the attached list with your submittal to the Environmental Protection Agency (EPA) of local control measures being considered. I would appreciate receiving a copy of the final June 16th submittal to EPA and also the June 23rd Initial Progress Report for the Memphis Area Early Action Compact.

If I can be of any further assistance, please do not hesitate to contact me.

Respectfully submitted,

Tipton County Executive

EARLY ACTION COMPACT RECOMMENDED 8-HOUR CONTROL STRATEGY OPTIONS FOR TIPTON COUNTY, TENNESSEE MEMPHIS METROPOLITAN STATISTICAL ARES

- 1. Low RVP(7.8 psi) gasoline (at refinery)
- 2. Stage I vapor recovery (at fueling stations)
- 3. Electric or propane-fueled forklifts
- 4. Ozone Alert program: Drive 55
- 5. Gas cap for vehicles giveaway
- 6. Lower speed limit from 70 to 55 mph for heavy duty (18 wheel) trucks during ozone season and increased enforcement
- 7. Intelligent Transportation System (electronic signs on roadway provide real time info to drivers)
- 8. Use TDOT "enhancements" grants to line greenways/bikeways/bike racks/pedestrian walkways
- 9. Adopt open burning restrictions during peak ozone periods
- 10. Provide the public with information through education programs and community events
- 11. Develop an air quality web page to provide the public with information
- 12. Encourage the use of catalyst and low sulfur diesel
- 13. Encourage car pooling and the use of area wide ride share incentives

NASHVILLE EARLY ACTION COMPACT AREA

Cheatham
Davidson
Dickson
Robertson
Rutherford
Sumner
Williamson

Wilson

LIST OF LIKELY CONTROL MEASURES FOR

Chea	tham County, COUNTY NAME	Touversee
	COUNTY NAME	
For the Early Action Comcontrol measures for the a pages as appropriate.	pact, the signatory below ag bove county. All other sign	grees to the attached list of like atories shall sign below or atta
William R. Oro NAME	nge Comb E	<u>S-29-03</u> DATE
Other signatories are as fo	llows:	
NAME	TITLE	DATE
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LIST OF EAC CONTROL MEASURES

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=Statewide
Mobile LDGV, HDGV	Support evaluation of an IM program EAC-wide or Statewide	NOx,VOC,	М	R	L and/or S
Mobile LDV	Free gas cap replacement program (in conjunction with IM)	VOC	М	R	L and/or S
Mobile	Local governments investigate installation of fuel infrastructure and conversion of local government fleets to alternative fueled vehicles	NOx, VOC, CO	M	R, V	<u>L</u>
Gasoline refueling stations	Implement or expand Stage I and or Stage II in all MSA counties	VOC	S	R	L and/or S
Stationary NOx sources	Support statewide NOx RACT Low NOx combustion controls	NOx	S	R	L and/or S
On-road HDDV and Buses	Encourage accelerated replacement with newer lower emitting vehicles	NOx, VOC,CO	M	V	L and/or S
On and Off Road Diesel Vehicles	Retrofitting local government vehicles (diesel fleets including school buses)	NOx, VOC, CO	М	R, V	
On and Off Road Diesel Vehicles	Encourage accelerated replacement with newer lower emitting vehicles	NOx, VOC,CO	M	V	L and/or S
On and Off Road Diesel Vehicles	Encourage use of catalysts and low sulfur diesel	NOx	М	V	L and/or S

	Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=Statewide
٠	On and Off Road Diesel Vehicles	Support the use of Cetane diesel fuel additive	NOx	М	R	L and/or S
/	Fleet Vehicles	Propose accelerated replacement with newer lower emitting vehicles or with vehicles using cleaner fuels	NOx, VOC,CO	М	V	L and/or S
	On-road vehicles On-road	Traffic signalization/synchronization Roadside assistance/Incident	NOx, VOC,CO NOx,	М	V	L
i	vehicles HDDV and	management program	VOC,CO	М	V	L
	buses	Truck stop electrification/Anti-idling regulation	NOx, VOC,CO	М	V/R	1
	All categories	Air Quality Action Day (AQAD)	NOx, VOC,CO	С	V	L and/or S
(Open burning	Open burning banperhaps on ozone action days	NOx, VOC,CO	S	R	1
	On-road HDDV trucks	Support reducing speed limit on ozone action days (or for the ozone season)	NOx	М	V	L and/or S
	On-road vehicles	Transportation management plan for large employers	NOx, VOC,CO	М	V	L
	On-road vehicles	Area wide rideshare incentives	NOx, VOC,CO	M	V	
	On-road vehicles	Support the enforcement of the smoking vehicle reg. similar to Davidson County to remove gross emitters from road	NOx, VOC,CO	M	R	L and/or S

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Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local S=Statewi
All gasoline				v=voidinary	3-Statewi
engines	Support lower gasoline RVP	VOC	M	R	S
All diesel engines	Participate in a regional initiative to seek early introduction of ultra- low sulfur diesel fuel	NOX, VOC, CO	М	R, V	L or S
TDOT	Support giving preference to bidders on state jobs with repowered, rebuilt or refueled diesel equipment	NOx, VOC,CO	М	R	S
Trip Reductions	Employer-based trip reduction plans	NOx, VOC, CO	М	V	L and/or
All	Student outreach through education systems; educate future drivers on the impact of motor vehicles on the environment	NOx, VOC, CO	M	V	L
All	Public education at community events	NOx, VOC, CO	С	V	L
All	Air quality web page/public information	NÓx, VOC, CO	С	V	L
OTHERS					



Bill Purceil Mayor

June 3, 2003

Commissioner Betsy Child Tennessee Department of Environment and Conservation 401 Church Street, 21st Floor Nashville, Tennessee 37243

Dear Commissioner Child:

Enclosed is Davidson County's submittal to comply with the Early Action Compact June 16, 2003, milestone. The "List of Davidson County 'Likely' EAC Control Options," provided by the Metropolitan Department of Health, is based upon the best information available to the Department as of June 1, 2003.

Sincerely,

Bill Purcell Mayor

BP/dt

Enclosure

cc: Mr. Barry Stephens

Division of Air Pollution Control

LIST OF DAVIDSON COUNTY "Likely" EAC CONTROL OPTIONS BASED ON INFORMATION AVAILABLE 6-1-03

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	N=New O=On-going E=Expand Existing	R=Regulatory V=Voluntary	L=Local S=Statewide
Stationary NOx sources	NOx RACT for sources not covered by the Federal NOx SIP callApply low NOx combustion controls to sources such as large internal combustion engines, boilers and other fuel burning equipment	NOx	S	N	R	L and/or S (TDEC)
Open burning	Revise open burning regulations to prohibit residential burning of leaves and yard clippings and restrict the use of air curtain destructors on air quality action days	NOx, PM, VOC,CO	S	E	R	L and/or S (TDEC)
LDGV, HDGV	Modify basic vehicle inspection program to include up to 10,000 lb. vehicles, tighten standards for 6,000 - 8,000 lb. vehicles	NOx, PM VOC,CO	M-gasoline	E	R	L and/or S (TDEC)
On-road vehicles	Expand HOV network and increase efficiency of existing HOV lane network	NOx, PM VOC.CO	M-gasoline	0	V	L and/or S
On-road vehicles On-road	Trip reduction plan for large employers including Metro and State	NOx, PM, VOC,CO	M-gasoline	0	V	(TDOT)
vehicles	Area wide rideshare incentives Intelligent transportation system such	NOx, PM VOC,CO	M-gasoline	E	V	<u> </u>
On-road vehicles	as traffic signal synchronization and roadside assistance/incidence management program	NOx, PM VOC,CO	M-gasoline and diesel	0	V	L and/or S (TDOT)
On-road /ehicles	Additional greenways and bike paths	NOx, PM, VOC,CO	M-gasoline	0	V	

LIST OF DAVIDSON COUNTY "LIKELY" EAC CONTROL OPTIONS (continued)

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	N=New O=On-going E=Expand Existing	R=Regulatory V=Voluntary	L=Local S=Statewide
On-road HDDV, buses and fleet vehicles	Encourage accelerated replacement with newer lower emitting vehicles, vehicles using cleaner fuels or using add on controls	NOx, PM, VOC,CO	M-diesel	N	V	L and/or S (TDEC/TDOT)
HDDV including buses	Truck stop electrification/Anti-idling regulation	NOx, PM, VOC,CO	M-diesel	N	V/R	L and/or S (TDEC)
Transit buses Transit	Reduced fare on AQAD Improve transit service including bus	NOx, PM, VOC,CO	M-gasoline	N	V	L
Vehicles	rapid transit and rail where feasible	NOx, PM, VOC,CO	M-gasoline and diesel	N	V	1
Off Road Vehicles and Equipment	Encourage accelerated replacement with newer lower emitting vehicles, vehicles using cleaner fuels or using add on controls	NOx, PM, VOC,CO	M-diesel	N	V	L and/or S (TDEC/TDOT)
On and Off Road Diesel Vehicles	Encourage the use of fuel additive to increase Cetane number of diesel fuel	NOx	M-diesel	N	V	L and/or S
Off Road Vehicles and Equipment	On State and Metro construction jobs, give preference to bidders using equipment that has been replaced with newer lower emitting vehicles, vehicles using cleaner fuels or using add on controls	NOx, PM, VOC,CO	M-diesel	N	R	(TDEC/TDOT) L and/or S (TDOT)
Airport service equipment and vehicles	Low NOx technologies	NOx	C	N	V/R	L
All categories	Air Quality Action Day (AQAD)	NOx, PM, VOC,CO	С	N	V	L and/or S (TDEC/TDOT)
Land use	Land use policies designed to reduce VMT growth	NOx, PM, VOC,CO	С	N	V/R	L

Dickson
TOT INTEND NEAD AT

For the Early Action Compact, the signatory below agrees to the attached list of likely control measures for the above county. All other signatories shall sign below or attach pages as appropriate.

Linda J. Frazier	County Exec.	6-9-03
NAME U	TITLE	DATE
Other signatories are as follows:		
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NAME	TITLE	DATE
NAME	TITLE	DATE
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LIST OF EAC CONTROL MEASURES

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local
Mobile LDGV, HDGV	Support evaluation of an IM program EAC-wide or Statewide	NOx,VOC,	M	R	S=Statewide L and/or S
Mobile LDV	Free gas cap replacement program (in conjunction with IM)	VOC	M	R	L and/or S
Mobile	Local governments investigate installation of fuel infrastructure and conversion of local government fleets to alternative fueled vehicles	NOx, VOC, CO	М	R, V	L
Gasoline refueling stations	Implement or expand Stage I and or Stage II in all MSA counties	voc	S	R	L and/or S
Stationary NOx sources	Support statewide NOx RACT Low NOx combustion controls	NOx	S	R	L and/or S
On-road HDDV and Buses	Encourage accelerated replacement with newer lower emitting vehicles	NOx, VOC,CO	M	V	L and/or S
On and Off Road Diesel Vehicles	Retrofitting local government vehicles (diesel fleets including school buses)	NOx, VOC, CO	М	R, V	//
On and Off Road Diesel Vehicles	Encourage accelerated replacement with newer lower emitting vehicles	NOx, VOC,CO	M	V	L and/or S
On and Off Road Diesel Vehicles	Encourage use of catalysts and low sulfur diesel	NOx	M	V	L and/or S

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local
On and Off Road Diesel Vehicles	Support the use of Cetane diesel fuel additive	NOx	M	R	S=Statewide L and/or S
Fleet Vehicles	Propose accelerated replacement with newer lower emitting vehicles or with vehicles using cleaner fuels	NOx, VOC,CO	М	V	L and/or S
On-road vehicles On-road	Traffic signalization/synchronization Roadside assistance/Incident	NOx, VOC,CO NOx,	M	V	L
vehicles HDDV and	management program Truck stop electrification/Anti-idling	VOC,CO NOx,	<u>M</u> .	V	L
buses	regulation	VOC,CO NOx,	M	V/R	L
All categories	Air Quality Action Day (AQAD) Open burning banperhaps on	VOC,CO NOx,	С	V	L and/or S
Open burning On-road	ozone action days	VOC,CO	S	R_	L
HDDV trucks	Support reducing speed limit on ozone action days (or for the ozone season)	NOx	M	V	L and/or S
On-road vehicles	Transportation management plan for large employers	NOx, VOC,CO	М	V	L
On-road vehicles	Area wide rideshare incentives	NOx, VOC,CO	M	V	L
On-road vehicles	Support the enforcement of the smoking vehicle reg. similar to Davidson County to remove gross emitters from road	NOx, VOC,CO	М	R	L and/or S

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Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory V=Voluntary	L=Local
All gasoline			0-00iiibiiiatioii	v=voluntary	S=Statewide
engines	Support lower gasoline RVP	voc	M M	R	_
All diesel engines	Participate in a regional initiative to seek early introduction of ultra- low sulfur diesel fuel	NOX, VOC, CO	M	R, V	S L or S
TDOT	Support giving preference to bidders on state jobs with repowered, rebuilt or refueled diesel equipment	NOx, VOC,CO	M	R	S
Trip Reductions	Employer-based trip reduction plans	NOx, VOC, CO	М	V	L and/or S
All	Student outreach through education systems; educate future drivers on the impact of motor vehicles on the environment	NOx, VOC, CO	M	V	L
AII	Public education at community events	NOx, VOC, CO	С	V	L
All	Air quality web page/public information	NOx, VOC, CO	С	V	L
OTHERS					
			:		



Robertson County Tennessee

HOWARD R. BRADLEY County Executive

108 County Courthouse SPRINGFIELD, TENNESSEE 37172 (615) 384-2476 FAX (615) 384-0617



May 3, 2003

Mr. Barry R. Stephens
Department of Environment and Conservation
Division of Air Pollution Control
401 Church Street, L & C Annex, 9th Floor
Nashville, TN 37243-1531

Dear Mr. Stephens:

Robertson County is submitting the following list of Likely Control Measures as required by the counties participation in the ozone Early Action Compact with the State of Tennessee and Environmental Protection Agency.

This list is of likely control measures that may be adopted for Robertson County when the decision is made in December on the actual control measures that will be adopted. The County will work with you and your office in the planning and adoption of the required measures.

If you have any questions regarding our list, please do not hesitate to contact me at 384-2476.

Respectfully.

Howard Bradley County Executive

Enclosure

xc. Members of the Robertson County Commission

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Proposed Air Quality Control Measures

These recommendations are actions that can be supported by Robertson County and possibly implemented by the county. This list is preliminary and additional measures may be added in the future after further study and receiving input from out the county.

- 1. Support Federal Initiates to add controls on Electrical Utility and Industrial sources.
- 2. Support and study ride share incentive programs due to a high commuter traffic rate from Robertson County.
- 3. Support the construction of High Occupancy Vehicle (HOV) lanes and the location of Commuter Park and ride lots. County can act as the coordination agency in the location and development of these lots.
- 4. Support requirement of the diesel fuel additive (cetane) in all vehicles.
- 5. Support land use decisions for the city, County and state that promotes pedestrian accessibility and discourages decisions that encourage urban sprawl.
- 6. Support the development of pedestrian and bicycle greenways (Such as the current ones in Springfield and White House).
- 7. Support the reducing the Speed Limit (from 70 to 55) for Trucks only on rural interstates.
- 8. Support a ban on open burning on ozone action days.
- 9. Support development in the education system a program to educate future drives on the impacts of vehicles on the environment.
- 10. Support truck stop electrification to reduce idling of heavy-duty vehicles.
- 11. Support, study and explore possible funding sources to replace older County diesel vehicles with more efficient and cleaner burning vehicles.

	RUTHERFORD	
	COUNTY NAME	
For the Early Action Comcontrol measures for the apages as appropriate.	spact, the signatory below agreabove county. All other signate	es to the attached list of likely ories shall sign below or attach
Many L.a	COUNTY EXECUTIVE TITLE	VE <u>5-29-03</u> DATE
Other signatories are as fol	llows:	
Jonny Bragg	Mayor Chy of M ho	10 6-4-03
NAME / OO	TITLED	DATE
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Muy C.	COUNTY EXECUT	TIVE 5-29-03 DATE
Other signatories are as Notau Hoa NAME	follows: May S. May 81, E	03 birlle (TN) 6-5-2003
NAME	TITLE	DATE

 	RUTHERFORD COUNTY NAME	
For the Early Action Components of the all pages as appropriate.	pact, the signatory below agree bove county. All other signator	s to the attached list of likely ries shall sign below or attach
Muy L.a.	COUNTY EXECUTIVE	<u>5-29-03</u> DATE
Other signatories are as fol	lows:	
Make We	AB MAYOR	6/4/63
NAME	TITLE	DATE /
NAME	TITLE	DATE
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TITLE

NAME

DATE

DATE

RUTHERFORD
COUNTY NAME
For the Early Action Compact, the signatory below agrees to the attached list of likely control measures for the above county. All other signatories shall sign below or attach pages as appropriate.
Unice & allen

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Other signatories are as follows:		
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NAME	TITLE	DATE

PROPOSED LIST OF RUTHERFORD COUNTY EAC REDUCTIONS

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	N=New O=On-going E=Expand Existing	R=Regulatory V=Voluntary	L=Local S=Statewide
LDGV, HDGV	Expand basic vehicle inspection program EAC-wide and modify to include up to 10,000 lb. Vehicles, tighten standards for 6,000-8,000 lb. Vehicles and include OBDII	NOx,VOC,	M-gasoline	E	R	L and/or S (TDEC)
On-road vehicles	Expand HOV network and increase efficiency of existing HOV lane network	Nox, VOC, CO	M-gasoline	0	V	L and/or S (TDOT)
On-road vehicles	Intelligent transportation system such as traffic signal synchronization and roadside assistance/incidence management program	Nox, VOC, CO	M-gasoline and diesel	0	0	L and/or S (TDOT)
On-road vehicles	Additional greenways and bike paths	Nox, VOC, CO	M-gasoline and diesel	0	V	L
On-road vehicles	Support state speed limit on interstates perhaps only when ozone action day called	Nox	M-gasoline and diesel	N	V/R	S (TDOT)
Transit buses	Support reduced fare on AQAD	Nox, VOC, CO	M-diesel	N	V	L
Transit vehicles	Investigate implementation of transit service including bus rapid transit and rail where feasible	Nox, VOC, CO	M-gasoline and diesel	N	V	L
Off road vehicles and	On state and local construction jobs, give favorable consideration	Nox, VOC, CO	M-diesel	N	R	L and/or S (TDOT)

equipment	to bidders using equipment that has been replaced with newer lower emitting vehicles, vehicles using cleaner fuels or using add on vehicles					
Airport service equipment and vehicles	Support low Nox technologies	Nox	С	N	V/R	L
All gasoline vehicles	Support lower gasoline RVP during ozone season	VOC	С	E	R	S (TDEC)
All categories	Air quality action day (AQAD)	Nox, VOC, CO	С	N	V	L and/or S
Land use	Land use policies designed to reduce VMT growth	Nox, VOC, CO	С	N	V/R	TDEC/TDOT



R.J. "HANK" THOMPSON SUMNER COUNTY EXECUTIVE

June 3, 2003

Jeanne Stevens
Nashville Area MPO Coordinator
730 Second Avenue South
Nashville, TN 37201

Dear Mrs. Stevens:

The enclosed information is in relation to the Early Action Compact efforts in Sumner County. I have included the information for the cities within Sumner County, which has been forwarded to this office. I believe the cities of Gallatin and Hendersonville have forwarded their own lists, independent of this information.

Sumner County has engaged in considerable dialogue, within various meeting formats, regarding the Early Action Compact. I feel that we have a good sense of the urgency associated with this very important initiative and I am confident Sumner County will do its part to meet the adopted goals.

There are a number of common measures set forth in the enclosures, as well as some that are unique to a given municipality or the county. It is my understanding that these are only suggestions for likely control measures, and are not considered binding at this time. It is also my understanding that we will have the opportunity to update and/or change these as we progress toward the deadline of March 31, 2004 for adoption of the Air Quality Improvement Plan.

Thank you for your assistance and guidance. If you have any questions regarding this matter, please feel free to call my office at 452-3604, or Mike Moulton at 442-1183.

Sincerely, P.J. Harb Thorper

R. J. "Hank" Thompson Sumner County Executive

Encl.

Sumner County Preliminary List of Air Quality Control Measures June 2003

- 1. Sumner County Resource Authority retro-fit
- 2. Support initiatives to add controls on Electrical Utility Sources (i.e. Gallatin plant)
- 3. Support initiatives to add control on Industrial Sources (i.e. gas lines)
- 4. Support initiative to apply Stage 1 automotive I/M program to all MSA counties
- 5. Encourage a funded gas cap replacement program
- 6. Support lowering Truck speed limits on interstates
- 7. Support initiative for Truck Stop Electrification/anti-idling regulation
- 8. Encourage accelerated replacement of Diesel powered On-road HDDV and Buses
- 9. Encourage and or implement use of low sulfur fuels
- 10. Implement use of Bio-Diesel with appropriate additives
- 11. Support expanding I/M program to cover more classifications of vehicles
- 12. Encourage accelerated replacement of fleet vehicles
- 13. Initiate recognition of "Air Quality Action Day"
- 14. Support Open burning ban during ozone action days
- 15. Support Rail Service projects (i.e. commuter and freight)
- 16. Encourage additional greenways and bike paths
- 17. Support area wide rideshare initiatives
- 18. Encourage stringent enforcement of smoking vehicle regulations
- 19. Give preference to bidders with re-powered, rebuilt or re-fueled diesel equipment
- 20. Implement Land Use Planning and/or Zoning that is environmentally friendly

City of Hendersonville



One Executive Park Drive

Hendersonville, TN 37075

Telephone (615) 822-1000

Fax (615) 264-5327 Telecommunications Device for Deaf (615) 264-5334

May 28, 2003

Sent via: US Mail

Mr. Quincy Styke Tennessee Department of Environment and Conservation 9th Floor, L & C Annex 401 Church Street Nashville, TN 37243-1531

RE:

Preliminary List of Air Quality Control Measures

City of Hendersonville, Tennessee

Dear Mr. Styke:

Attached is a list of Air Quality Control measures the City of Hendersonville will be considering as part of the Early Action Compact. This list is not intended as any endorsement of the measures by the city. We will be reviewing each measure for effectiveness, costs, practicality, enforceability and other various factors as relate to air quality and the common good for our region and our community.

Many of these measures will require state and regional implementation to be viable and effective. We will be reviewing these with the support of the Nashville Metropolitan Planning Organization for our recommendation, support or action as needed.

Please call me if you have any questions

Sincerel

Jim Fuqua

Mayor

Cc: Fred Rogers, Planning Director Jim Harrison, Public Works Director Jeanne Stevens, Nashville MPO Hendersonville Alderman

Mayor Jim Fuqua Vice Mayor Hamilton Frost, Jr. Ward One

Ward Two

Ward Three

Ward Four

Ward Five

Ward Six

Scott Foster, P.E. Jack Long

Jamie Clary Scott Sprouse

Jo Skidmore Mark Skidmore Bill Portman Fred Qualls

James Carmack, Jr., M.D. Hamilton Frost, Jr.

Doug Buck Chris Forsythe, J.D.

City of Hendersonville Preliminary List of Air Quality Control Measures to Consider

- 1. Encourage and support federal initiatives to add controls on electrical and industrial sources.
- 2. Encourage and support statewide Vehicle Inspection and Maintenance Programs
- 3. Support development of a comprehensive mass transit system for the Metropolitan Nashville area.
- 4. Explore and work to identify possible funding sources for replacement of older vehicles with newer vehicles that produce fewer pollutants.
- 5. Support initiatives to promote or require truck stop electrification programs.
- 6. Support land use plans and zoning for the city, county and region which promotes pedestrian traffic, mass transit, walk able communities and reduction of sprawl.
- 7. Support initiatives by the state to reduce speed limits for trucks and/or all vehicles on interstates.
- 8. Support prohibiting open burning for commercial and/or all uses.
- 9. Support initiatives to provide better monitoring for more precise identification and modeling of air quality problems.
- 10. Support programs such as high occupancy vehicle lanes, commuter park and ride lots and other measures to promote ridesharing.
- 11. Explore initiatives to reduce commercial generation of pollutants from unique sources such as dry cleaning, painting and other various operations.
- 12. Support tree preservation measures that limit commercial and residential generation of rubbish that would be hauled or burned.
- 13. Support identifying and announcing air quality action days that encourage or discourage activities that degrade air quality.
- 14. Support planning and development of improvements to streets, highways and intersections that provide travel that is more efficient and improves air quality.
- 15. Strongly support the development of Pedestrian and Bicycle Greenways.

City of Millersville Recommended Air Quality Control Measures

These recommendations includes, but are not limited to, items the City of Millersville supports to improve Air Quality. With further studies performed by and support from the Nashville Metropolitan Planning Organization this list is subject to amendments and changes.

- 1. Supports Federal Initiates to add controls on Electrical Utility and Industrial Sources.
- 2. Supports more stringent and statewide Vehicle Inspection and Maintenance Programs.
- 3. Supports, study, and explore funding sources for the use of alternative fuel vehicles and diesel fuel additives for Millersville's vehicle fleet and all local government and state government fleets. We are currently studying the possibilities and feasibility of using and storing bio-diesel.
- 4. Supports the construction of high occupancy vehicle (HOV) lanes and Commuter Park and ride lots. The City can be instrumental in helping locate appropriate site for park and ride lots.
- 5. Supports and study ride share programs due to high commuter rate in Millersville. Employer transportation management plans for large employers.
- 6. Supports the need for public transportation in the Nashville Metropolitan Area
- 7. Supports, study, and explore possible funding sources to replace older City diesel vehicles with more efficient and cleaner burning vehicles.
- 8. Strongly supports Pedestrian and Bicycle Greenways.
- Supports the study and possible funding sources to improve the traffic flow of all city, county, and state streets, highways, and intersections.
- 10. Support tighter regulations prohibiting open burning and explore the possibility of eliminating commercial open burning.
- 11. Supports truck stop electrification to reduce idling heavy-duty diesel vehicles.
- 12. Supports land use decisions for the city, county, and state that promotes pedestrian accessibility and discourages decisions that encourage sprawl.

City of White House Recommend Air Quality Control Méasures

These recommendations includes, but are not limited to, items the City of White of House supports to improve Air Quality. With further studies performed by and support from the Nashville Metropolitan Planning Organization this list is subject to amendments and changes.

- 1. Supports Federal Initiates to add controls on Electrical Utility and Industrial Sources.
- 2. Supports more stringent and statewide Vehicle Inspection and Maintenance Programs.
- 3. Supports, study, and explore funding sources for the use of alternative fuel vehicles and diesel fuel additives for White House's vehicle fleet and all local government and state government fleets. The City through the MPO has requested and has received preliminary approval for CMAQ funding for a Hybrid Vehicle. The vehicle will be a test model for the City and an educational tool for the citizens and students of White House.
- 4. Supports the construction of high occupancy vehicle (HOV) lanes and commuter park and ride lots. The City can be instrumental in helping locate appropriate site for park and ride lots.
- Supports and study ride share programs due to high commuter rate in White House. Employer transportation management plans for large employers.
- 6. Supports the need for public transportation in the Nashville Metropolitan Area
- 7. Supports, study, and explore possible funding sources to replace older City diesel vehicles with more efficient and cleaner burning vehicles.
- 8. Strongly supports Pedestrian and Bicycle Greenways. The City currently has almost two miles of greenway and is currently in the process of constructing four additional miles that will connect civic buildings, parks, shopping areas, schools, and neighborhoods.
- 9. Supports the study and possible funding sources to improve the traffic flow of all city, county, and state streets, highways, and intersections.
- 10. Supports prohibiting open burning. The city recently passed an ordinance prohibiting commercial open burning.
- 11. Supports truck stop electrification to reduce idling heavy-duty diesel vehicles.
- 12. Supports land use decisions for the city, county, and state that promotes pedestrian accessibility and discourages decisions that encourage sprawl.



June 6, 2003

WILLIAMSON COUNTY

Rogers C. Anderson, County Executive 1320 West Main Street, Suite 125 Franklin, Tennessee 37064 (615) 790-5700, Fax (615) 790-5818

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Mr. Barry R. Stephens, Director Division of Air Pollution Control Department of Environment and Conservation 401 Church Street L & C Annex, 9th Floor Nashville, Tennessee 37243-1531 RE: Early Action Compact, "Likely Control Measures"

Dear Mr. Stephens:

Per your letter of 20 May '03, attached you will find a list of "Likely Control Measures," a stipulation of Williamson County remaining in the Early Action Compact (EAC). Please be advised that Williamson County reserves the right to disassociate from the EAC in accordance with the terms of the same.

In recent meeting with representatives of several of the municipalities, it was noted that Division of Air Pollution had not directly contacted these jurisdictions regarding the EAC. This finding was particularly disconcerting given the spirit of the various representations made by yourself and employees of Division of Air Pollution Control at recent Metropolitan Planning Organization (MPO) meetings. To date, the only meaningful outreach has occurred via the efforts of the MPO Staff. It is strongly suggested that Division of Air Pollution Control use the time period while the "likely control measures" are being modeled to engage the several municipalities within Williamson County in a meaningful dialogue regarding the EAC.

Williamson County Government and its Municipalities, recognize the importance of clean air to our citizens, and the implications of being designated a "non-attainment area" by EPA. We want to work in partnership with TDEC and the MPO, to identify a process and programs that will benefit all of Middle Tennessee.

Sincerely,

Rogers C. Anderson

County Executive

/cb

LIST OF EAC CONTROL MEASURES

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory	L=Local
Mobile			0-00mbination	V=Voluntary	S=Statewide
LDGV, HDGV	Support evaluation of an IM program EAC-wide or Statewide	NOx,VOC,	М	R	L and/or S
Mobile LDV	Free gas cap replacement program (in conjunction with IM)	VOC	М	R	L and/or S
Mobile	Local governments investigate installation of fuel infrastructure and conversion of local government fleets to alternative fueled vehicles	NOx, VOC, CO	M	R, V	L
Gasoline refueling stations	Implement or expand Stage I and or Stage II in all MSA counties	VOC	S	R	L and/or S
Stationary NOx sources	Support statewide NOx RACT Low NOx combustion controls	NOx	S	R	L and/or S
On-road HDDV and Buses	Encourage accelerated replacement with newer lower emitting vehicles	NOx, VOC,CO	М	V	L and/or S
On and Off Road Diesel Vehicles	Retrofitting local government vehicles (diesel fleets including school buses)	NOx, VOC, CO	М	R, V	
On and Off Road Diesel Vehicles	Encourage accelerated replacement with newer lower emitting vehicles.	NOx, VOC,CO	M	V	L and/or S
On and Off Road Diesel Vehicles	Encourage use of catalysts and low sulfur diesel	NOx	М	V	L and/or S

Source Category	Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory	L=Local
On and Off		100000	0-00mbination	V=Voluntary	S=Statewide
Road Diesel Vehicles	Support the use of Cetane diesel fuel additive	NOx	М	R	L and/or S
Fleet Vehicles	Propose accelerated replacement with newer lower emitting vehicles or with vehicles using cleaner fuels	NOx, VOC,CO	М	V	L and/or S
On-road		NOv			
vehicles	Traffic signalization/synchronization	voc,co	M	v	
On-road	Roadside assistance/Incident	NOx.	141	V	L
vehicles HDDV and	management program	voc,co	М	v	
buses	Truck stop electrification/Anti-idling	NOx,		v	<u> </u>
Duses	regulation	VOC,CO	м	V/R	. 1
All categories	Air Ougliba Auli	NOx,			L
711 categories	Air Quality Action Day (AQAD)	VOC,CO	C	V	L and/or S
Open burning	Open burning banperhaps on ozone action days	NOx,			L and/or 3
On-road		VOC,CO	S	R	L
HDDV trucks	Support reducing speed limit on ozone action days (or for the ozone season)	NOx	М	V	L and/or S
On-road vehicles	Transportation management plan for large employers	NOx, VOC,CO	М	V	L
On-road rehicles	Area wide rideshare incentives	NOx,			
	Support the enforcement of the	VOC,CO	M	V	L
On-road rehicles	smoking vehicle reg. similar to Davidson County to remove gross emitters from road	NOx, VOC,CO	M	R	L and/or S

Source Category	Control Measure Description	Poilutant Reduced	S=Stationary M=Mobile C=Combination	R=Regulatory	L=Local
All gasoline			0200mbmation	V=Voluntary	S=Statewide
engines	Support lower gasoline RVP	voc	M	D	_
All diesel engines	Participate in a regional initiative to seek early introduction of ultra- low sulfur diesel fuel	NOX, VOC, CO	M	R R, V	L or S
TDOT	Support giving preference to bidders on state jobs with repowered, rebuilt or refueled diesel equipment	NOx, VOC,CO	M	R	S
Trip Reductions	Employer-based trip reduction plans	NOx, VOC, CO	М	V	L and/or S
All	Student outreach through education systems; educate future drivers on the impact of motor vehicles on the environment	NOx, VOC, CO	M	V	L
All	Public education at community events	NOx, VOC, CO	С	V	L
All	Air quality web page/public information	NOx, VOC, CO	С	V	L
OTHERS					
	·				

Williamson

COUNTY NAME

For the Early Action Compact, the signatory below agrees to the attached list of likely control measures for the above county. All other signatories shall sign below or attach pages as appropriate.

Ropers C. Ande	con Lante Exec	AWE 6 JUNE 2003
NAME	TITLE'	DATE
Other signatories are as fo	llows:	
NAME	TITLE	DATE

FAX NO. 6157900469 Jun. 03 2003 09:284M Pb

BROM: WILLIAMSON COUNTY PLANNING

FAX NO. : 5918531

LIST OF LIKELY CONTROL MEASURES FOR

Williamson

	COUNTY NAME	
For the Early Action Compact, control measures for the above pages as appropriate.		
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Other signatories are as follows Color of the ankling NAME NAME	at Adm.	DATE ZOST
NAME	TITLE	DATE

ANNE DUNN MAYOR BRIAN J. SWEENEY VICE-MAYOR MICHAEL W. WALKER CITY MANAGER



COMMISSIONERS ANNE DUNN BRIAN J. SWEENEY ROBERT L. HIGGS, P.E. JOE REAGAN REGINA R. SMITHSON

June 3, 2003

Mr. Barry Stephens, Director Division of Air Pollution Control Department of Environment and Conservation 401 Church St. L&C Annex, 9th Floor Nashville TN 37243-1531

Dear Mr. Stephens:

This letter is intended to indicate the City of Brentwood's concurrence with the list of "Likely Control Measures" submitted by Williamson County Executive Rogers Anderson as part of the County's continued participation in the Nashville Area Early Action Compact process.

It is understood that concurrence with this list of Likely Control Measures in no way commits the City of Brentwood to implement any of these measures at this time and that any formal commitment by the City of Brentwood to future implementation of air quality control measures through the Early Action Compact would be subject to a vote of the entire Brentwood Board of Commissioners.

If you have any questions regarding the City's position on this matter, please feel free to contact Assistant City Manager Kirk Bednar at (615) 371-0060.

Sincerely

Anne Dunn

Mayor

FAX NO. : 5918531

Jun. 03 2003 03:01PM P6

LIST OF LIKELY CONTROL MEASURES FOR

	Williamson	
	COUNTY NAME	
For the Early Act control measures pages as appropri	tion Compact, the signatory below for the above county. All other si ate.	agrees to the attached list of likely gnatorics shall sign below or attach
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Other signatories at Cherry & NAME	TITLE	puni Salvi believe 2003-
NAME	TITLE	DATE

DATE

OM : WILLIAMSON COUNTY PLANNING FAX NO. : 5918531

Jun. 86 2883 11:50AM P7

JUN-03-03 TUE 08:21 AM CITY of FRANKLIN / ADMIN FAX NO. : 5918531

FAX NO. 6157900469

MOIN: WILLIAMSON COLATTY PLANNING

LIST OF LIKELY CONTROL MEASURES FOR

Specific Section Control of the Cont	VILLIAMSON COUNTY NAME	
For the Early Action Components measured for the about the same pages as appropriate.	act, the signatory below agrees to ove county. All other signatoric	o the attached list of likely shall sign below or attack
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Other signatories are as for NAMIE	Hows:	DATE Lo-(a-0)
NAME	TITLE	DATE
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NAMB	TITLE	DATE

WILLIAMSON COUNTY

Community Development 1320 West Main St., Suite 400 Franklin, Tennessee 37064 615-790-5725 FAX 615-591-8531

MEMORANDUM

TO: Rogers Anderson, County Executive

FROM: Joe Horne, Community Development Director Have

RE: Early Action Compact (EAC) Signatories

DATE: 6 June '03

This memorandum will serve as an update as to the signatories to the Early Action Compact (EAC). To date, Williamson County, Franklin, Brentwood, Spring Hill and Thompsons Station have formally indicated their interest in the EAC, and documentation of such has been forwarded to TDEC. To follow is the status of the remaining municipalities:

- Nolensville- as you know, Mayor Knapper was unable to attend our meeting of 24 May '03. Your proposed letter and attachments were faxed to Mayor Knapper earlier this week. I have not received a response.
- Fairview- no representatives of Fairview attended the meeting of 24 May '03. In a conversation yesterday, City Manager Al Deck acknowledged he was not aware of the EAC or its goals. Further, based on this conversation, it is unlikely that Fairview will commit to the EAC until this matter can be taken up with their Board of Mayor and Aldermen.

At this juncture, none of the municipalities have expressed an unwillingness to participate in the EAC. If/when they choose to do so, their intent shall be forwarded to TDEC.

cc File

FROM : TOWN OF NOLENSVILLE

FAX NO.: 7763634

Jun. 09 2003 07:57AM P2

Gail Phillips Alderman

Joe Rossi Rositano Alderman

Cindy Lancaster
Town Recorder



Tommy Dugger
Alderman

Tomes I Felts

James L. Felts Alderman

Charles F. Knapper

Mayor

À...

Town Of Nolensville

June 6, 2003

Mr. Joe Horne, Director Williamson County Development 1320 West Main Street, Suite 400 Franklin, Tennessee 37064

Dear Joe,

The Nolensville Board of Mayor and Aldermen have unanimously voted to participate in the Early Action Compact with Williamson County.

Please convey to the Metropolitan Planning Office the Town Of Nolensville has agreed as outlined in your previous letter.

Thank you very much for your cooperation in this matter.

Sincerely,

Charles F. Knapper,

Mayor

Cc: Jeanne Stevens, MPO Coordinator Metropolitan Government Board of Mayor and Aldermen ROBERT DEDMAN County Executive



RACHEL WARREN
Assistant/Secretary

WILSON COUNTY GOVERNMENT

June 5, 2003

Mr. Barry R. Stephens, P.E.
Director
Division of Air Pollution Control
Tennessee Department of Environment and Conservation

Mr. Stephens,

Re: List of potential control measures that the Wilson County Commission may consider enacting or supporting.

The following is a list of potential control measures that could meet with some favorable consideration from the Wilson County Commission regarding control of air pollution and the pending early action compact agreement (EAC) for the Middle Tennessee Region.

This list should be viewed as a list of those measures which might be considered by the Wilson County Commission. Under no circumstance should they be viewed as a commitment to enact or support any of the measures. Before, the County will be able to abide by an EAC agreement or related control measures; a significant effort must be made on behalf of the Environmental Protection Agency, the Tennessee Department of Environment and Conservation and other interested parties to educate both the County elected officials and the citizens of Wilson County regarding what the issues are that are driving this EAC agreement and what the issues are regarding our air quality and public health. We as county elected officials need to understand clearly the choice we are being asked to make. This choice must be illustrated in simple and concise terminology and the explanation of the choice must also adequately address pros and cons for each means of progressing (i.e. what happens if we continue participating in the EAC and what happens if we don't?). Information I have received and staff reports I have received regarding the pros and cons and regarding recent studies have been confusing and sometimes in conflict with one another. Many important questions have remained unanswered. Finally, it is imperative that the participating municipalities within the MPO be brought up to speed on the early action compact by TDEC and the EPA, if this has not already occurred. It is my opinion that this task should not fall to the various County Executives and County Staffs to try and educate the municipalities within our jurisdiction about this

important subject. I do not have an adequate grasp on all issues surrounding the EAC to sell or even simply educate my County Commission; much less someone else's City Council, about these issues.

With the above being stated, here is a list of control measures that might be considered or supported:

1. Support evaluation of an Inspection and Maintenance (IM) program EAC-Wide or Statewide.

Explanations and Opinions: The elected officials that have been in office since this type of program was enacted in our County are not terribly pleased with the program. Much of this displeasure may be related to a lack of education regarding the reasons for the program. They do not relate the air quality concerns to their everyday lives. Of particular concern to many is the fact that Wilson County has been required to participate and other Counties in the region have not. This proposed expansion might gain some favor given its potential for being perceived as an issue of fairness.

- 2. Free Gas Cap Replacement program (In conjunction with IM)
- 3. Local Governments investigate installation of fuel infrastructure and conversion of local government fleets to alternative fueled vehicles.

Explanations and Opinions: Only if costs to do so are less than or at least equivalent to traditional fuels, vehicles, and infrastructure.

Support statewide NOx RACT Low NOx combustion controls.

Explanations and Opinions: If this is referring to controls on heavy industry, the county may support it but we really do not have any local authority to enforce it at this time.

5. Encourage accelerated replacement with newer lower emitting Vehicles for on road heavy duty diesel vehicles and buses, as well as, for other on- and off-road vehicles.

Explanations and Opinions: It is my belief that the County Commission might support this issue regarding the County's own fleets if it were cost effective. Secondly, we could support an aging vehicle replacement subsidy for the general citizenry or private sector but some funding source would have to be provided to support this effort.

6. Retrofitting local government vehicles (Diesel fleets including school buses) with the means to run on alternative fuels like biodiesel with a low NOx additive.

Explanations and Opinions: See explanation to #3 above.

7. Traffic Signalization/Synchronization

Explanations and Opinions: We may support this, but our local impact is perceived as minimal. We do not have many traffic signals within our jurisdiction that are under county control. Most are either State or City controlled.

8. Roadside Assistance/Incident Management Program

Explanations and Opinions: We may support, but this is perceived as something more efficiently operated and undertaken by State Department of Transportation as is evidenced by current State program.

9. Air Quality Action Day

Explanations and Opinions: This could probably be supported by resolution of the County Commission if they were made aware of the value as related to health and other air quality related concerns.

10. Transportation Management Plan for Large Employers

Explanations and Opinions: We may support encouragement of this but really have no local control or authority over this item.

11. Open Burning Ban - On High Ozone Days

Explanations and Opinions: We may support, but it would be difficult to enforce given current staffing levels and responsibilities in relation to the 535 square miles encompassed within our County.

12. Support enforcement of the Smoking Vehicle Regulation similar to one recently adopted in Davidson County.

Explanations and Opinions: It is assumed that the local Sheriff's Department would enforce this regulation if enacted. If County Commission were adequately educated as to the impacts this could have, they might pass it.

13. Participate in a regional initiative to seek early introduction of low sulfur diesel fuels.

Explanations and Opinions: If this were done through some organization such as the MPO, we might participate.

14. Public Education and Outreach

Explanations and Opinions: The County may be willing to participate in various air quality education programs aimed at students in local schools and aimed at the general public; including educational presentations, web page development, public advertisements, etc.

15. Encourage alternative means of Transportation that can reduce the number of pollutant emitters (cars) on the road system.

Explanations and Opinions: The County already participates to a small extent in these types of efforts. Recently, the respective county commissions and city councils of Wilson County, the City of Lebanon, the City of Mount Juliet, and Metropolitan Nashville/Davidson County all voted to support local funding of a 37,000,000.00 commuter rail project to run between downtown Nashville and Lebanon, Tennessee. Other efforts within Wilson County such as encouragement of greenways and bikeways are progressing at a slower pace.

Other suggested early action measures from your letter, dated May 20, 2003 were perceived to be totally implausible for local implementation or were perceived to be outside of the realm of action, responsibility, or authority that can be expected of local government.

In closing, it is my hope that this letter fulfills the needed requirements to be met regarding continued participation in the development of an early action compact (EAC) for the region. However, I also hope it serves as an illustration of the large task that lies before us in adequately laying out the choices the region must make regarding air quality compliance. If I can be of further assistance, please let me know.

Chum

Sincerely,

County Executive

Wilson County, Tennessee

PUTNAM COUNTY EARLY ACTION COMPACT

Putnam Cou
COUNTY NA

For the Early Action Compact, the signatory below agrees to the attached list of likely control measures for the above county. All other signatories shall sign below or attach pages as appropriate.

Ki Blayland	County Executive	6-3-03
NAME	TITLE	DATE
Other signatories are as follows:		
NAME	TITLE	DATE



300 E. Spring St. - Rm. 8 Cookeville, TN 38501 (931) 526-2161Ph. 528-1300 Fox

RECEIVED
JUN 0 4 2003

June 3, 2003

To Whom It May Concern:

Putnam County has entered into the Early Action Compact. The Intergovernmental Committee, which consist of four Cookeville City Council members and four Putnam County Commissioners, the Cookeville City Manager, and myself, met and determined the following to be a list of likely control measures for our area.

- 1. Support evaluation of an IM program EAC-wide.
- 2. Support statewide Nox RACT low Nox combustion controls.
- 3. Encourage accelerated replacement with newer lower emitting vehicles for both on-road HDDV and buses and on and off-road diesel vehicles.
- 4. Support the use of Cetane diesel fuel additives for on and off-road vehicles.
- 5. Consider traffic signalization/synchronization and a roadside assistance/incident management program for on-road vehicles.
- 6. Posting signs at truck stops to encourage truckers and buses to not idle their engines.
- 7. Support designating an "Air Quality Action Day".
- 8. Ban open burning on ozone action days.
- 9. Student outreach education programs.
- 10. Public education at community events.
- 11. Air Quality Web page.

The City of Cookeville has recently completed or is in the process of completing the following control measures:

- 1. A bike/pedestrian trail beginning at South Willow Ave. going west through Cane Creek and returning.
- 2. The City Council recently appointed a "greenway/pedestrian/bike trail task force" which developed a master plan for these trails throughout the city.
- 3. The City of Cookeville inventoried and classified, by use, all land in the city. Any rezoning that does not comply with the land use plan requires an amendment to the land use plan.
- 4. In 2002, the city adopted a new zoning code that requires landscaping and tree plantings in commercial areas.
- 5. This month, the City Council will receive a report from a traffic engineering firm that is performing a major thoroughfare study for the city. This study will aid the city in developing better traffic flow and signal synchronization.

If there are any questions, please, contact my office.

Sincerely,

Kim Blaylock, County Executive



COUNTY EXE

COUNTY EXECUTIVE
KIM BLAYLOCK
PUTNAM COUNTY, TENNESSEE
300 East Spring Street, Room 8
Cookeville, Tennessee 38501
Tel: 931/526-2161
Fax: 931/528-1300

FAX NUMBER: 931/528-1300

IMPORTANT NOTICE

This message is intended only for the use of the individual or entity to which it is addressed. If you have received this communication in error, please notify us immediately by telephone, and return the original message to us at the above address via the United States Postal Service. Thank You.

DATE	6-10-03
FROM	Kim Blaylock
ATTN	Uickie Lowe
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June 10, 2003

To Whom It May Concern:

3312581300

Putnam County would like to add the following measures to their list of likely actions regarding the reduction of NOX:

- 1. Speed limit reductions on big trucks on ozone action days.
- 2. No idle rule for school buses.

Sincerely,

Kim Blaylock, County Executive

TRI-CITIRES EARLY ACTION COMPACT AREA

Carter
Hawkins
Johnson
Sullivan
Unicoi
Washington

Tennessee

Development

207 North Boone Street, Suite 800 • Johnson City, Tennessee 37604 (423) 928-0224 • FAX: (423) 928-5209

RECEIVED

JUN 0 5 2003

Carter

Elizabethton Watauga

June 5, 2003

Greene

Baileyton Greeneville

Mosheim Tusculum Barry Stephens

Tennessee Department of Environment and Conservation

Division of Air Pollution Control

9th Floor, L&C Annex 401 Church Street

Nashville, TN 37243-0554

Hancock Sneedville

Dear Mr. Stephens,

Hawkins

Bulls Gap Church Hill ount Carmel Rogersville Surgoinsville

Enclosed is a list of 'likely control measures" for the Tri-Cities MSA Early Action Compact as well as signatures from Mayors and County Executives that have signed the Tri-Cities MSA Early Action Compact.

If you have any questions or need additional information, please feel free to contact me at 423-928-0224.

Johnson ountain City Thank You for your assistance,

Sincerely, hiph L. Groug

Sullivan

Bluff City Bristoi Kingsport Christopher L. Craig

Director of Environmental Programs

Unicoi

Erwin Unicoi

/ashington

hnson City esborough





List of Tri-Cities Early Action Compact Local Air Quality Control Measures Under Consideration June 5, 2003

Control Measure Description	Pollutant Reduced	S=Stationary M=Mobile C=Combination	N=New O=On-going	R=Regulatory V=Voluntary	L=Local S=Statewide
Ozone Action Day Program Reduced VMT Reduced idling Reduced Lawn & Garden	NOx. VOC, CO	С	О	V	L
Ban open burning on ozone action days	NOx, VOC, CO	S	N	R	L and/or S
Cost-Effective NOx Controls for Industrial Sources	NOx	S	N	R	L/S
Congestion Mitigation (Examples) North State of Franklin Road, JC Jonesborough US 11E Elizabethton US 321	NOx, VOC, CO	M	N	V	L
Incident Management System for New I-26	NOx, VOC, CO	M	N	V	L
Stage I Vapor Recovery for Gasoline Tanker Loading and Unloading	VOC	М	N	R	L/S
Stage II Vapor Recovery at Gasoline Stations	VOC	M	N	R	L/S
Lower Reid Vapor Pressure (7.8 psi) for Gasoline	VOC	М	N	R	L/S
Reduced Interstate Truck Speed Limits on Ozone Action Days	NOx, VOC, CO	М	N	V/R	S (TDOT)

List of Tri-Cities Early Action Compact Local Air Quality Control Measures Under Consideration June 5, 2003

Vehicle Emissions Inspection &	NOx, VOC, CO	M	N	R	L/S
Maintenance Program			İ		
 On-board diagnostics for 96 and) 			
newer		: 			1
 Basic tail-pipe test for 95 and 		:		•	
older		1			
Local Ordinance on Smoking Vehicles	NOx, VOC, CO	M	N	R	L
TDOT preference to bidders on state jobs	NOx, VOC, CO	M	N	R	S (TDOT)
with repowered, rebuilt, or refueled diesel		· 1			
equipment.		<u> </u>			
Use Biodiesel in heavy-duty vehicle	NOx, VOC, CO	\mathbf{M}	N	V	L
fleets		<u> </u>			
Cetane additive for Diesel Engines	NOx	M	N	V	L
Low Emission Technology on New	NOx, VOC, CO	M	N	V	L
School Buses with Allowance for			·		
Exceptions for Mandatory 10 yr		. I			
Retirement		! !			
On and Off-Road Diesel Engine Retrofits	NOx, VOC, CO	M	N	V	L
		1			
		. 1			

TRI – CITIES MSA Early Action Compact Region

For the Early Action Compact, the signatories below agree to the attached list of likely control measures for the above Early Action Compact Region.

Name Suyma		Representing	6/2/2003 Date
Wale fair	COUNTY EXEC.	CARTER CO Representing	6/2/2003 Date
Socret Name	Country Exec.	House Livs C. Representing	Date
Name (Title Texc.	Unica 60 Representing	<u>6-2-2003</u> Date
Tichon S Venal	Title Title	Tullubin Representing	6/2/3 Date
George Jay	Martine County Er	Representing	Of 2/03
) Ivaine	/		•

Billy Myers	mayor s	Representing	Date 6/2/03
Russell Brod	ling Mays)	Representing	<u>B-1-03</u> Date
John L Bles Name	Lac Mayor Title	Jonesbourg h	6/2/03 Date
dish Bane	Mayr Title	Butol In Representing	6 2 03 Date
Janette D. Blogs	Title Tryon	Liggent TN Representing	6/z/03 Date
Name	Title	Representing	Date